

Effective Date: August 1, 2013      Revised: November 1, 2018

**POLICY**

---

INFORMATION MANAGEMENT, PRIVACY AND SECURITY, RESEARCH AND SCHOLARLY ACTIVITIES

# HIPAA Policy Manual – Privacy and Security of Protected Health Information for BU Healthcare Provider Covered Components

---

RESPONSIBLE OFFICE  
**Research Compliance**

---

---

## Table of Contents

Section	Name
HCP Introduction	<a href="#">HIPAA at Boston University</a> Privacy and Security Policy Responsibility

Section	Name
HCP Policy 1	<p data-bbox="540 212 756 247"><u><a href="#">HIPAA Basics</a></u></p> <p data-bbox="540 296 1040 331">1.1 HIPAA Covered Components</p> <p data-bbox="540 380 756 415">1.2 Key Roles</p> <p data-bbox="540 464 797 499">1.3 What is PHI?</p> <p data-bbox="540 548 857 583">1.4 De-Identified PHI</p> <p data-bbox="540 632 1365 667">1.5 The Covered Component's Designated Record Set</p> <p data-bbox="540 716 1279 751">1.6 The Covered Component's HIPAA Workforce</p> <p data-bbox="540 800 813 835">1.7 Access to PHI</p> <p data-bbox="540 884 834 919">1.8 HIPAA Training</p>
HCP Policy 2	<p data-bbox="540 978 1256 1014"><u><a href="#">Individual Responsibilities for Safeguarding PHI</a></u></p> <p data-bbox="540 1062 1268 1098">2.1 Safeguarding Paper and Other Tangible PHI</p> <p data-bbox="540 1146 976 1182">2.2 Safeguarding Verbal PHI</p> <p data-bbox="540 1230 1024 1266">2.3 Safeguarding Electronic PHI</p>
HCP Policy 3	<p data-bbox="540 1314 1398 1409"><u><a href="#">Using PHI in Treatment, for Payment, and for Healthcare Operations; Business Associates</a></u></p> <p data-bbox="540 1457 740 1493">3.1 Overview</p> <p data-bbox="540 1541 987 1577">3.2 Minimum Necessary Rule</p> <p data-bbox="540 1625 1235 1661">3.3 Special Rules for PHI in Limited Data Sets</p> <p data-bbox="540 1709 1471 1745">3.4 Patient Authorization Not Needed for Treatment Purposes</p> <p data-bbox="540 1793 1097 1829">3.5 Using PHI for Payment Purposes</p> <p data-bbox="540 1877 1321 1913">3.6 Using PHI for Health Care Operations Purposes</p>

Section	Name
HCP Policy 4	<p>3.7 Routine Disclosures to an Individual’s Family and Friends</p> <p>3.8 Sharing PHI with the Patient’s Other Providers and Health Plans</p> <p>3.9 Disclosing PHI to Business Associates</p> <p><u>Uses Required or Permitted by Law: Prohibited Uses of PHI</u></p> <p>4.1 Required by Law</p> <p>4.2 Prohibited Uses of PHI: Marketing; Sale; non-BU Purposes</p> <p>4.3 Fundraising and Promotion</p>
HCP Policy 5	<p><u>Situations in which Authorizations are Necessary</u></p> <p>5.1 General Rules on Authorization</p> <p>5.2 Parents, Guardians, and Minors</p> <p>5.3 Legally Authorized Representative of an Adult Patient</p> <p>5.4 After a Patient’s Death</p> <p>5.5 Research: Authorizations and Waivers</p> <p>5.6 Students and Observers</p> <p>5.7 Using PHI in Publishing</p>
HCP Policy 6	<p><u>Individuals’ Rights under HIPAA</u></p> <p>6.1 Right to Notice of Privacy Practices</p> <p>6.2 Right to Access and Copy Own Health Record</p> <p>6.3 Right to Request Amendment</p> <p>6.4 Right to an Accounting of Disclosures</p>

Section	Name
HCP Policy 7	<p>6.5 Right to Request Restriction</p> <p>6.6 Right to Request Confidential and Alternative Modes of Communication</p> <p>6.7 Right to Complain</p> <p><u>Breaches</u></p> <p>7.1 Obligation to Report Potential Breaches</p> <p>7.2 No Retaliation</p> <p>7.3 Investigation and Remedial Action for Reports of Potential Breaches</p> <p>7.4 Breach Notifications</p> <p>7.5 Enforcement and Sanctions</p>
HCP Policy 8	<p><u>HIPAA Security Program</u></p> <p>Philosophy</p> <p>Defined Terms</p> <p>8.1 Identify</p> <p>8.2 Protect</p> <p>8.3 Detect: Information System Activity Reviews</p> <p>8.4 Respond</p> <p>8.5 Recover Contingency Planning; Emergency Mode Operations: Recovery</p>
HCP Policy 9	<p><u>Documentation and Retention</u></p>
HCP Policy 10	<p><u>Exceptions</u></p>

Section	Name
HCP Policy 11	<a href="#"><u>Definitions</u></a>
HCP Appendix	<a href="#"><u>Appendix A – HIPAA Contacts</u></a>

Last updated: November 2018

---

---

END OF POLICY TEXT

---

---

## Additional Resources Regarding This Policy

### Related Policies, Procedures, and Guides

- HIPAA
  - [HIPAA Policies for BU Health Plans](#)
  - [HIPAA Information for Charles River Campus Researchers](#)
- [Data Protection Standards](#)
- [Sensitive Data Incident Response](#)
- [FERPA Policy](#)
- [Access to Electronic Information Policy](#)
- [Digital Privacy Statement](#)
- [Conditions of Use and Policy on Computing Ethics](#)
- [Network Security Monitoring Policy](#)
- [Information Security Policy](#)
- [Listing of related BU TechWeb Policies](#)

### Related Procedure

- [Policy Violation Notification Procedure](#)

## **BU Websites**

- [HIPAA at Boston University](#)
  - [FAQ's](#)
  - [Forms for Health Care Providers](#)
  - [HIPAA for BU Researchers](#)
  - [HIPAA Data Security Tips](#)
  - [Report a Possible HIPAA Breach](#)
- [HIPAA Information on the BU Research Support Website](#)

Categories: Information Management, Privacy and Security, Protected Health Information - HIPAA, Protected Health Information - HIPAA and Research, Protected Health Information - HIPAA for BU Healthcare, Research and Scholarly Activities, Research Compliance and Safety  
Keywords: HIPAA