

MEMORANDUM

To: USC Faculty and Staff

From: Laura LaCorte, Associate Senior Vice President, Compliance
Ajay Vyas, Director, HIPAA Privacy

Date: January 12, 2012

Re: USC HIPAA Policies Update

The USC HIPAA policies have been updated as of November 2011 to incorporate changes to the HIPAA privacy and security rules that were introduced by the Health Information Technology for Economic and Clinical Health (HITECH) Act and to reflect the USC name change. While the revisions to incorporate HITECH did not alter most of the policies materially, there are a few significant changes that are highlighted below:

- The *Education of Covered Workforce* (GEN-101) policy requires new employees to take the education program within the first **30 days** of employment. The previous policy required new employees to complete the education within the first 90 days of employment.
- The *Policy Regarding Business Associates* (BUS-701) reflects the business associate agreement review process to include negotiation of all business associates agreements by the Office of Compliance and use of the USC Business Associate Addendum template that has been revised as of November 2011.
- The *Notice of Privacy Practices* (CLIN-200) has been revised to include the notice of privacy practices process implemented by the clinical practice units.
- A *Facility Directory Policy* (CLIN-204) has been created that outlines how limited protected health information may be maintained in a facility directory in accordance with the HIPAA privacy regulations at USC.
- A *Mitigation and Sanctions Policy* (PAT-607) has been created outlining the process for reporting privacy complaints and potential sanctions for violation of privacy policies including disciplinary action in accordance with applicable university policies and procedures, including the USC Faculty Handbook, SCampus, and Staff Employment Policies and Procedures as applicable.
- The *Authorizations for Use of Health information for Media Purposes, Fundraising and Research* have all been revised and updated. If you are working in any of these areas please make sure to use these updated forms. Copies can be found at <http://policies.usc.edu/index-hipaa.html>.

More changes to these policies will be forthcoming as significant changes to privacy laws continue to evolve. Questions about these policies should be directed to the USC Office of Compliance at (213) 740-8258 or complian@usc.edu.