
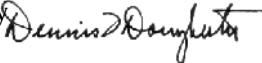


MEMORANDUM

To: Deans, Directors, Vice Presidents, Senior Business Officers, Supervisors, USC Faculty and Staff

From: Lloyd Armstrong, Jr. 
Dennis F. Dougherty 

Date: February 19, 2003

Subject: Health Insurance Portability and Accountability Act (HIPAA)-Privacy Regulations

In April 2001, we informed you about new federal regulations, known as the Health Insurance Portability and Accountability Act (HIPAA) privacy law, which generally prohibit the use and disclosure of health information without written permission from the patient. The regulations establish a federal right to privacy relating to an individual's health information, which is in addition to existing state laws. All institutions covered by the regulations, including USC, must be in full compliance with the federal law by **April 14, 2003**.

Like many universities with medical, dental and allied health professional schools, USC uses patient health information in various contexts, including for treatment of patients, research, education and instruction, solicitation of potential donors and public relations efforts. As a result, the privacy rules impact us in far-reaching ways and will affect how many of you perform your job responsibilities.

Two years ago, we designated the USC Office of Compliance to oversee implementation of a university-wide program to comply with the privacy regulations. Laura LaCorte, Executive Director of that office, is USC's designated Privacy Officer. The Office of Compliance has collaborated with numerous faculty and staff members to implement a program to bring USC into compliance with the impending privacy regulations. The program includes the development of an education program to satisfy the HIPAA requirements, as well as policies and procedures that address specific aspects of the HIPAA regulations.

Education

All USC faculty and staff members who are covered under the HIPAA privacy regulations are required to receive education about the privacy law by the April 14, 2003 compliance deadline. The Office of Compliance, in conjunction with a number of USC faculty and staff members, has developed an online education program to satisfy this federal mandate. The program can be accessed at www.usc.edu/compliance. The following categories of USC employees are required to complete this education program:

- Health care providers (e.g., physicians, dentists, nurses, physical and occupational therapists, pharmacists)
- Researchers who use participants' health information to conduct their research and/or recruit subjects (e.g., clinical trials, epidemiological studies)

- Clinical staff who access patient health information as part of their job responsibilities (e.g., technicians, front office, medical records and billing staff)
- Research staff who access patient health information as part of their job responsibilities (e.g., research administrators, nurse coordinators)
- Fundraising and marketing staff who access USC patient lists or use USC patient health information to solicit donors or provide marketing information
- USC volunteers who assist our clinical practice offices and access USC patient health information as part of their volunteer job responsibilities

All USC faculty and staff members covered under the HIPAA privacy regulations must complete this program no later than April 14, 2003.

The above list is not intended to be all-inclusive. If you are unclear as to whether you must complete USC's HIPAA education program, please contact the Office of Compliance or refer to USC's HIPAA education policy, which can be found on the University policies Web site at: <http://policies.usc.edu>, and the compliance Web site at: www.usc.edu/compliance. If in doubt as to whether you are covered under the regulations, it is highly recommended that you complete the program as the privacy regulations broadly define USC's covered workforce. Further information about the program is included on the compliance Web site.

HIPAA Policies and Procedures

USC's official policies, procedures and template forms to comply with the privacy regulations will be located on the University's policies Web site at: <http://policies.usc.edu>, and the compliance Web site at: www.usc.edu/compliance, and will be updated and revised as appropriate to comply with the privacy rules.

All USC faculty and staff members are expected to comply with these policies and procedures.

You will be receiving additional information about the HIPAA privacy regulations and how they pertain to your specific job responsibilities at USC. The Institutional Review Boards (IRBs) at each campus will be sending information to researchers about how the regulations will impact human subjects research. USC Care Medical Group, Inc., will be providing information to the faculty physicians and staff who provide clinical services. Also, faculty and staff representatives from affected schools are working to incorporate HIPAA privacy training into appropriate student curricula.

In the interim, if you have questions about the HIPAA privacy regulations, please contact the Office of Compliance at (213) 740-8258.

cc: Todd Dickey
Martha Harris
Alan Kreditor
Laura LaCorte
Stephen Ryan