

MEMORANDUM

To: LAC+USC Medical Center Medical Staff

From: LACDHS Privacy Officer
Laura L. LaCorte- USC HIPAA Privacy Officer

Date: April 7, 2003

Subject: HIPAA Privacy Rule – Education Requirement

As you know, LAC+USC Medical Center and the University of Southern California are required to comply with 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 and LAC+USC Medical Center, must be in full compliance with the federal law by **April 14, 2003**.

Under the regulations, USC and LAC+USC Medical Center are required to educate their respective workforce about the privacy law by the April 14, 2003 compliance deadline. In an effort to avoid duplication of effort when we have overlapping covered workforce members and mutual obligations to educate our covered workforce under the HIPAA Privacy Rule, USC and LAC+USC Medical Center have agreed to the following reciprocity:

For those individuals who are solely the covered workforce of either Los Angeles County's Department of Health Services (DHS) or USC (but not both), each covered entity (i.e., USC and DHS) will accept the other entity's HIPAA privacy education program. Accordingly, a covered workforce member simply would need to provide a copy of his/her certificate of completion of the appropriate education program. For example, a USC staff member who has completed the USC online HIPAA education program will have satisfied DHS' education requirement in this regard so long as the individual provides DHS with proof of completion of the USC course.

With respect to those individuals who are covered workforce of both entities (specifically, USC faculty members who are DHS employees), DHS will accept USC's education program as fulfilling the requirements of LA County's initial education

requirement. Because the USC education program covers a number of topics that may relate to a USC faculty appointment, USC will not accept DHS' certification in this instance.

Per HIPAA regulations, DHS will require USC faculty to complete training on DHS specific policies and procedures regardless of whether they completed the USC program.

It is imperative that all covered workforce members from each entity that have access to identifiable health information complete the applicable education program. The University of Southern California has defined its covered workforce in its education policy, which can be downloaded at www.usc.edu/compliance.

Thank you for your cooperation.

cc: David Altman, MD
Ronald Kaufman, MD
Joseph Van Der Meulen, MD