



University of Connecticut Health Center

POLICY NUMBER 2003-02

January 29, 2008

POLICY: RECORD KEEPING

(Privacy & Security of Protected Health Information (PHI))

PURPOSE:

To provide UCHC staff with direction regarding the record keeping requirements created under the Health Insurance Portability and Accountability Act.

SCOPE:

This policy applies to all persons working in UCHC who have responsibility to create or maintain documents noted below.

POLICY STATEMENT: The UCHC is committed to achieving excellence in retaining documentation of all items related to information security and privacy. It is our intention to comply with state, federal, and JCAHO requirements. The organization will maintain accuracy and completeness of such documents in a secure and confidential manner for a specified time frame as defined by state and federal regulations or guidelines. Please refer to the Connecticut State Library Records Management Manual governing records retention in State Agencies. All documents noted below will be kept AT LEAST for the 6 years required by HIPAA, but in many instances must be retained for longer periods to comply with State Agency retention periods.

Records kept for the Privacy and Security of Protected Health Information may include, but are not limited to:

- All policies and procedures
- Authorization forms (blank and signed)
- Notice of Privacy Practices (all versions)
- Business associate contracts
- Requests for inspection/copying, including denials
- Requests for amendment and the responses to those requests
- Requests for Accounting of Disclosure of PHI, and copy of account log given to patient
- Workforce training logs
- Complaints received and resolution of same
- Requests for restrictions/confidential communications, and agreement/denial
- Privacy and Security Officer job descriptions
- Medical/Dental Records
- Billing/Payment Records
- Patient Acknowledgment of Privacy Notice

Reference: §164.530 (j) The Health Insurance Portability and Accountability Act of 1996

Iris Mauriello	2/06/08
_____	_____
Corporate Compliance Integrity/Privacy Officer	Date
Jonathan Carroll	2/18/08
_____	_____
Information Security Officer	Date
Peter J. Deckers, M.D.	2/20/08
_____	_____
Executive Vice President for Health Affairs	Date

Originally Issued: April 13, 2003

Updated: n/a

Reviewed: 1/29/08 w/o changes