



# University of Connecticut Health Center

**POLICY NUMBER 2003-05**

**January 29, 2008**

**POLICY: HIPAA MARKETING COMPLIANCE  
(PRIVACY & SECURITY OF PROTECTED HEALTH INFORMATION  
(PHI))**

**PURPOSE:** To comply with applicable HIPAA marketing requirements.

**SCOPE:**

Applies to all University of Connecticut Health Center (UCHC) workforce:

- Employees (including faculty and staff)
- Volunteers
- Students and residents
- Temporary staff
- Agency and contracted staff
- Credentialed staff
- Members of the Board of Directors

**POLICY STATEMENT:**

HIPAA regulations allow marketing, provided UCHC first obtains a written authorization from the individual before disclosing PHI about that individual to another party for marketing purposes.

Definition: HIPAA regulations define “Marketing” as an arrangement between UCHC and any other party whereby UCHC discloses PHI to the other party in exchange for direct or indirect remuneration, in order for the other party to make a communication about its own product or service that encourages recipients of the communication to purchase or use that product or service.

However, even though it is permissible under HIPAA, UCHC believes that disclosure of PHI by UCHC to a third party for marketing purposes that may benefit UCHC or the third party is not in the best overall interest of our patients and their families.

Therefore, disclosures such as these are not permitted by any individual or department within UCHC.

Reference: § 164.514 (e) Health Insurance Portability and Accountability Act of 1996

**Iris Mauriello**

**2/6/08**

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**Corporate Compliance Integrity/Privacy Officer**

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**Date**

**James H. Walter**

**2/11/08**

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**Associate Vice President for Communications**

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**Date**

**Peter Deckers, M.D.**

**2/14/08**

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**Executive Vice President for Health Affairs**

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**Date**

**Originally Issued: April 14, 2003**

**Updated: 3/28/05**

**Reviewed: 1/29/08 w/o changes**