



# University of Connecticut Health Center

**POLICY NUMBER 2003-12**

**January 29, 2008**

**POLICY: PRIVACY PRACTICES: UCHC NOTICE TO PATIENTS  
(Privacy & Security of Protected Health Information (PHI))**

**PURPOSE:**

UCHC has established and disseminated a Notice of privacy practices to inform patients of how their protected health information is used and disclosed, their rights, and how to exercise those rights. The Notice provides guidance to UCHC staff working with patients regarding requirements under HIPAA for notice of privacy practices.

**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:**

1. Content: The Notice contains:

- A description of uses and disclosures that we are permitted to make for treatment, payment and healthcare operations.
- A description of uses and disclosure made without patient authorization.
- Which uses are required by law and which are permitted by law.
- A description of other uses and disclosures for which the hospital will seek patient authorization.
- An explanation regarding appointment reminders, treatment alternatives or other health related benefits/services.
- An explanation regarding contacting the patient to raise funds.
- An explanation of our duties under this law.
- An explanation of the patient's right to revoke authorization.

- The patient's right to request restrictions, to which the entity may or may not be, obligated to accept.
- The patient's right to confidential communications.
- The patient's right to inspect and/or request copies of the information in the medical record and request amendments.
- The patient's right to an accounting of disclosures made of his/her medical information.

All procedures for how patients exercise these rights.

- A contact name (or office) and telephone number to contact us for complaints.
- A statement that the individual will not be retaliated against for complaints.
- An explanation that the patient may complain to the Secretary of DHHS.
- The date of the version of the Notice.

## 2. Review, Dissemination and Retention of the Notice:

By disseminating a Notice of privacy practices, UCHC is accountable to its patients for uses and disclosures of protected health information.

- a) The Privacy Officer reviews the Notice on an annual basis. If any changes or revisions are made, UCHC will again disseminate that new information to all patients/staff.
- b) The Notice and any changes are reviewed by the UCHC Executive Policy committee.
- c) The Notice is reviewed with all staff members upon hire and again whenever material change in the Notice is made.
- d) The Notice is disseminated:
  - to all past patients at the first instance of service delivery following the compliance date or revision date
  - to all new patients upon first delivery of service
  - by posting the Notice prominently for patients and visitors to see (i.e. registration areas, patient care areas, waiting rooms, Office of Patient Relations)
  - by posting the Notice on our website
  - to any patient requesting the Notice electronically
- e) The Privacy Officer retains the privacy Notice and policies and procedures related to the Notice for six years from the date of its creation or the date when it was last in effect, whichever is later.

## 3. Documentation of Patient Acknowledgment:

UCHC is obligated to document compliance with the Notice requirements:

- a) By asking each patient to sign an acknowledgement of receipt of the privacy Notice at the time of his/her first visit for service after compliance date (April 14, 2003); this acknowledgement is included on the basic consent to treatment form (HCH901).

- b) By entering into registration database the date of signature of patient's acknowledgement of receipt or that patient refused to sign the acknowledgement and date.
- c) By maintaining a copy of the signed acknowledgement in patient's medical/dental record. (HCH901)

Reference: § 164.520 Health Insurance Portability and Accountability Act of 1996  
UCHC Notice of Privacy Practices (attachment)  
UCHC Policy #2003-13 titled "Permission to Treat/Assignment of Benefits/Authorization to Release Medical Records/Acknowledgment of Receipt: Notice of Privacy Practices"

Iris Mauriello	02/06/08
_____	_____
<b>Corporate Compliance Integrity/Privacy Officer</b>	<b>Date</b>
Peter Deckers, M.D.	02/08/08
_____	_____
<b>Executive Vice President for Health Affairs</b>	<b>Date</b>

**Attachment:**  
University of Connecticut Health Center Notice of Privacy Practices

**Originally Issued: April 14, 2003**  
**Updated: 3/28/05**  
**Reviewed: 1/29/08 w/o changes**

