

Health Insurance Portability and Accountability Act (HIPAA)
Student Compliance Information and Agreement of Understanding
School of Human Environmental Sciences
University of North Carolina at Greensboro

What is HIPAA?

The Health Insurance Portability and Accountability Act (HIPAA) is designed to expand health coverage by improving the portability and continuity of health insurance coverage in group and individual markets by: combating waste in health care delivery; promoting the use of medical savings accounts; improving access to long-term care services and coverage; and simplifying the administration of health insurance. Part of this function involves the development of standards for the electronic transmission, privacy and security of certain health information. HIPAA penalties for noncompliance, according to Federal Law (Standards For Privacy of Individually Identifiable Health Information, U.S. Dept. of HHS, § 160.300) range from \$100 per person per violation to fines of up to \$250,000 and/or imprisonment of up to ten years for willful disclosure of protected health information. The University and your internship coordinator take a breach of patient confidentiality very seriously. Noncompliance will be considered a violation of the UNCG Academic Integrity Policy (found at <http://saf.dept.uncg.edu/studiscp/Honor.html>).

- HIPAA requires personally identifiable health information (PHI) be handled and stored properly. This includes maintaining appropriate administrative, technical and physical safeguards:

1. to ensure the integrity and confidentiality of the information,
2. to protect against any reasonably anticipated threats to security and unauthorized uses or disclosures of information, and
3. to otherwise ensure compliance

- HIPAA contains four components:

1. Privacy Standards - effective April 14, 2003
2. Security Standards - DHHS has not published final regulations: no date for compliance set
3. Electronic Transactions and Code Sets- October 16, 2002 (UNCG has filed for a 1 year extension)
4. National Provider, Employer and Personal Identifiers - currently effective

Who is Subject to HIPAA?

- As a student intern working in a healthcare facility, you are subject to HIPAA.
- Personally identifiable health information (information, oral or recorded in any form or medium, that is a subset of health information, including demographic information, collected from an individual and which:
 1. Is created or received by a health care provider, health plan, employer or health care clearinghouse; and,
 2. Relates to the past, present or future physical or mental health or condition of an individual, the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual;

and

3. Identifies the individual or may be reasonably believed to be a means to identify the individual.

- Treatment, payment or health care operations (e.g. health claims, eligibility, payment, claim status, referral)

How will HIPAA impact student interns?

- HIPAA restricts use and disclosure of personally identifiable health information (PHI) unless written patient consent is obtained or other exceptions are in place (e.g. certain employment records, education records covered by FERPA, student health records)
- HIPAA requires the healthcare facility in which you intern to have in place administrative procedures, physical safeguards and technical security services, including adoption of policies, procedures, safeguards, privacy notices, staff training, designated compliancy personnel in each department. **It is your responsibility to know and understand what is expected of you by the facility in which you are interning and to follow their policies and procedures.**

What else must a student intern do to be in compliance?

Privacy Standards

- A major component of HIP AA compliance involves privacy standards for the client/patient with which you work. All client/patient medical data must be "**deidentified**" before being shared. In other words, health information on a client/patient must not be traceable to this individual.

- **For Individuals, Employers, Relatives or Household Members**

- **Remove All:**

- Telephone numbers
- Fax numbers
- E-mail addresses
- Social security numbers
- Health plan and beneficiary numbers
- Medical record numbers
- Account numbers
- Certificate and license numbers
- Vehicle identifiers and serial numbers, including license plate numbers
- Web URLs Internet IP addresses
- Device identifiers and serial numbers
- Biometric identifiers including finger and voice prints
- Full face photos and comparable images
- Birth dates (except year), admission date, discharge date, date of death, etc.

- All Personally Identifiable Health Information (PHI) must be de-identified **PRIOR** to leaving the health facility. A key or code for re-identification of patient information may

be created if there is a need to re-identify the individual patient for treatment purposes. The identifying code may not be kept with the PHI.

- Any Personally Identifiable Health Information (PHI) that you as a student are reporting on/discussing in class, or in a class assignment/report must be deidentified.

Security Standards

- Any information concerning Personally Identifiable Health Information (PHI) stored on a computer must be de-identified.
- Any information, such as reports or case studies, which contains Personally Identifiable Health Information (PHI) **MUST NOT** be transmitted via computer (e-mail/internet), fax, or any other electronic means.
- As a healthcare provider, you have a duty to protect the confidentiality and integrity of confidential medical information, as required by law, professional ethics, and accreditation requirements. PHI must be disposed of by a means that will assure that it will not be accidentally viewed by an outside party.
 - o PHI must not be thrown into trash bins, or other publicly accessible locations.
 - o PHI must be discarded following the policies set forth by your internship site. It is your responsibility to acquire this information and to comply completely.

Adapted in part from: HIPPA At A Glance And Slide Presentation. entitled, "Health Insurance Portability and Accountability Act" UNCG University Council's Office.

PLEASE SIGN THE ATTACHED FORM AND RETURN IT TO YOUR INTERNSHIP
COORDINATOR PRIOR TO BEGINNING WORK AT YOUR INTERNSHIP SITE.

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I, _____ (Print name of student)*, have read, understand, and agree to follow the standards set forth in this document concerning client/patient Personally Identifiable Health Information (PHI) as required in the Health Insurance Portability and Accountability Act (HIPAA) of 1996. I have read and understand that noncompliance may result in disciplinary actions being taken by my internship coordinator, the University and/or by the Government of the United States.

Signature of Student

Date signed

Signature of Internship Coordinator

Date signed

*** Signature of student under 18 years of age must be accompanied by signature of Parent or Legal Guardian.**