

Board Meeting
July 13, 2017

REVISE THE UNIVERSITY OF ILLINOIS HEALTH INSURANCE PORTABILITY
AND ACCOUNTABILITY ACT (HIPAA) PRIVACY AND SECURITY
COMPLIANCE POLICY

Action: Revise the University of Illinois Health Insurance Portability and
Accountability Act Privacy and Security Compliance Policy

Funding: No New Funding Required

On November 14, 2013, the Board of Trustees adopted a HIPAA Privacy and Security Compliance Policy establishing a structure for compliance with HIPAA and its companion regulations. Over the past two years, the System-wide HIPAA Privacy and Security Official has worked closely with a HIPAA compliance committee and liaisons in the affected units to advance compliance efforts across the System. With progress comes the need for a policy revision to accomplish the following:

- To clarify that the President or the President's designee appoints the Privacy Official and the Security Official, who may be the same person, ensuring one point of accountability for privacy compliance and one for security compliance as required by law;
- To specify that the Privacy Official and the Security Official report to the President or the President's designee, creating the necessary flexibility to establish the optimal HIPAA reporting structure;
- To clarify that health care components may consist of units or components of units that perform HIPAA-covered functions or activities, thus reducing risk by minimizing the number of individuals in the hybrid entity;

- To remove the designation of the University-wide Privacy and Security Compliance Council given that its mandate is broader than HIPAA and it can be re-designated below the Board level; and,
- To set forth the HIPAA training requirement for individuals covered by the policy.

The President recommends that the Board approve the revised HIPAA Privacy and Security Compliance Policy.

The Board action recommended in this item complies in all material respects with applicable state and federal laws, University of *Illinois Statutes*, *The General Rules Concerning University Organization and Procedure*, and Board of Trustees policies and directives.