

Effective Date: August 1, 2013 Revised: April 27, 2022

POLICY

INFORMATION MANAGEMENT, PRIVACY AND SECURITY, RESEARCH AND SCHOLARLY ACTIVITIES

HIPAA Health Care Providers Policies Appendix A: Contacts

RESPONSIBLE OFFICE

Research Compliance

This Appendix A is part of the <u>HIPAA Policy Manual</u>: Privacy and Security of Protected Health Information for BU Healthcare Provider Covered Components.

The BU HIPAA Privacy Officer is Jessica Captain Novick	617-358-3124	jcaptain@bu.edu
The BU HIPAA Security Officer is David Corbett	617-414-1475	corbettd@bu.edu
General questions on HIPAA		hipaa@bu.edu

The HIPAA Contacts designated by the Covered Components are as follows:

GSDM Dental Health Centers	Kathryn Mulligan	kmulli@bu.edu
Danielsen Institute	Lauren Kehoe	lkehoe@bu.edu
Student Health Services	Judy Platt, MD	juplatt@bu.edu
Sargent Choice Nutrition	Stacey Zawacki Sara Yen	szawacki@bu.edu syen@bu.edu
BU Rehabilitation Services	James Camarinos (PT) Terry Ellis (Neuro)	jcam@bu.edu tellis@bu.edu

The HIPAA Contacts designated by the Support Units are as follows:

Information Services and Technology	Eric Jacobsen	jacobsen@bu.edu
Office of the General Counsel	Lilly Huang	lohuang@bu.edu
Compliance Services	Nedra Abbruzzese-Werling	nedra@bu.edu
Risk Management	James Donohue	jdonohue@bu.edu
Internal Audit	Silifa Wallace	silifa@bu.edu
Finance	Matt Abrams	abramsm@bu.edu

Covered Component HIPAA Contact Duties

The Covered Component HIPAA Contact is responsible for implementing the BU HIPAA Policies in the Covered Component. This includes, but is not limited, to:

- Serves as the primary resource for members of the Covered Component Workforce for information on HIPAA;
- Works closely with the BU HIPAA Privacy Officer and Security Officer on matters involving HIPAA;
- Develops procedures for the Covered Component to support implementation of the BU HIPAA policies in the Covered Component;
- Determines and documents the Designated Record Set;
- Determines and documents who is in the Covered Component HIPAA Workforce;
- Develops procedures for granting, modifying and terminating access to PHI within the Covered Component, as well as procedures to audit implementation;
- Ensures all members of the HIPAA Workforce complete training as required;
- Receives reports of potential HIPAA breaches in the Covered Component and acts appropriately, notifying the BU HIPAA Privacy and/or Security Officer as appropriate;
- Develops and implements procedures for release of information that are consistent with the BU HIPAA policies;
- Receives complaints from patients regarding possible violation of their rights to the privacy and security of their PHI, and responds appropriately, notifying the BU HIPAA Privacy and/or Security Officer as appropriate;
- Ensures patient's HIPAA rights are respected, including the right to access; right to request amendment; right to request a restriction; right to an accounting; and right to notification of a breach;
- Maintains a log of unauthorized disclosures of PHI;
- Assists the BU HIPAA Privacy and/or Security Officer in investigating potential breaches in the Covered Component;
- Creates and maintains inventories of systems, applications and devices;

- Works with the BU HIPAA Security Officer on security risk assessments;
- Ensures a comprehensive information security program is developed for the Covered Component, consistent with the requirements of Section 8 of the BU HIPAA Health Care Providers Manual; and
- Ensures the appropriate staff, faculty, trainees and others in the Covered Component Workforce have appropriate input into the Covered Component's HIPAA Procedures.

In all of these activities, the HIPAA Contact will be supported by the BU HIPAA Privacy and/or Security Officer, as well as by the Covered Component's Information Security support staff. The HIPAA Contact is responsible for the above, but is not expected to carry out each of these alone; rather, the HIPAA Contact may delegate duties as appropriate.

END OF POLICY TEXT

Additional Resources Regarding This Policy

Related Policies, Procedures, and Guides

- HIPAA
 - HIPAA Policy Manual: Privacy and Security of Protected Health Information for BU Healthcare Provider Covered Components
 - HIPAA Policies for BU Health Plans
 - HIPAA Information for Charles River Campus Researchers
- Data Security
 - Data Protection Standards

BU Websites

- HIPAA at Boston University
 - FAQ's

- Forms for Health Care Providers
- HIPAA for BU Researchers
- HIPAA Data Security Tips
- Report a Possible HIPAA Breach

Categories: Information Management, Privacy and Security, Protected Health Information - HIPAA for BU Healthcare, Research and Scholarly Activities, Research Compliance and Safety