

University of Colorado School of Medicine

Graduate Medical Education

Policy: HIPAA Compliance		
Effective date: November 19, 2003	GMEC Approval / Revision Date: November 19, 2003	Pages: 1

Purpose:

To ensure that residents functioning in training programs approved by the GMEC comply with legal requirements addressing the access of information under the Health Insurance Portability and Accountability Act of 1996 (HIPAA) *Standards for Privacy of Individually Identifiable Health Information (Privacy Rule)*.

Note: ACGME makes no distinction between interns, residents and fellows. All levels are referred to as “residents”.

Policy and Procedure:

All University of Colorado School of Medicine GMEC approved training programs will adhere to requirements addressed under HIPAA regulations.

Compliance with HIPAA Privacy Rule requirements will be a stated objective under the ACGME Professionalism core competency.

Allegations against a resident addressing violation of HIPAA regulations will be referred to the University of Colorado Health Sciences Center (UCHSC) HIPAA Compliance Officer for investigation.

A substantiated first violation, as determined by the UCHSC HIPAA Compliance Officer will result in a resident being required to complete and document a program of remediation to be determined by the UCHSC HIPAA Compliance Officer, with concurrence from the Program Director.

A second substantiated violation, as determined by the UCHSC HIPAA Compliance Officer may be grounds for termination from a GMEC approved training program or subject the offender to other sanctions, including formal Probation, as agreed to by the UCHSC HIPAA Compliance Officer and Program Director.

The UCHSC legal office will arbitrate situations in which program directors and the UCHSC HIPAA Compliance Officer are unable to reach agreement on actions following a second substantiated violation.