

Confidentiality of Health Information Policy

Definitions

The following terms are used in this policy.

Term	Definition
PHI	Protected Health Information

Policy

The Research Foundation of SUNY (RF) authorizes only those individuals who administer health insurance plans access and use of health information to the minimal extent necessary to accomplish their jobs. Health information is strictly confidential and should never be disclosed, nor confirmed to anyone who is not specifically authorized under the RF's policies or applicable law to receive the information.

Failure to adhere to state and federal law or Research Foundation policies and procedures regarding the confidentiality of protected information will be considered a breach of confidentiality and will result in the imposition of appropriate disciplinary actions.

Confidentiality Agreement

Each member of the Research Foundation's affected workforce (those performing tasks authorized under Statement of Policy above) will be expected to review and sign a confidentiality agreement. This should occur upon hire/affiliation or assignment to authorized tasks. This signed statement will be maintained in the appropriate employee personnel file or, in the case of a workforce member who is not a Research Foundation employee, the file that is maintained for that individual.

Suspected Breach

Any and all breaches of confidentiality should be reported to the area/department supervisor. Failure to report a breach will be considered a violation of this policy. Investigation of a suspected breach of confidentiality should be done in concert with the institution's privacy official or his/her designee, in accordance with the policy on [Disciplinary Action Regarding a Breach of Confidentiality of Protected Health Information \(PHI\)](#).

Education and Training

The Research Foundation is responsible for providing job appropriate training to its workforce regarding:

- the need for confidentiality;
- types of information that are considered confidential;
- disciplinary actions associated with a breach of confidentiality; and
- the institution's confidentiality agreement and the need for each workforce member to acknowledge by signature the confidentiality obligations applicable to the workforce member.

Training material for the RF workforce will be available on the RF [Training](#) page.

Basis for Policy

The Research Foundation of SUNY (RF) is committed to protecting the privacy and confidentiality of health information of the population it serves.

Responsibilities

This policy identifies the following responsibilities as assigned to those cited below.

Role	Department/Unit	Contact Information
Comply with	<ul style="list-style-type: none"> • Employees • Volunteers • All students participating in a health-related program administered by the Research Foundation (including medical interns and residents) • Agency and contracted staff (including temporary staff) • Consultants • Contractors and subcontractors • Faculty performing services on Research Foundation administered programs • Credentialed staff of a hospital who perform services on Research Foundation administered programs 	n/a
Access and use of health information	Individuals who administer health insurance plans	n/a
Policy Authorization	Office of Administration and Human Resources	(518) 434-7080

Related Resources

Below are related resources to carry out the policy or that provides other relevant information or instructions.

Resources
Disciplinary Action Regarding a Breach of Confidentiality of Protected Health Information (PHI)

Change History

Date	Change History
December 31, 2009	Repair Policy on Disciplinary Action Regarding a Breach of Confidentiality of protected Health Information (PHI) link.
September 27, 2004	Revised Statement of Policy section to remove "Individuals who administer research projects with human subjects" as authorized to access health information.
March 31, 2003	New Document

Effective Date: April 1, 2003

Responsible Party: Office of Administration and Human Resources

Contact Information: (518) 434-7080

Feedback

Was this document clear and easy to follow? Please send your feedback to webfeedback@rfsuny.org.

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