Included in this newsletter is guidance on various HIPAA-related topics that impact your everyday work life. Hopefully, it will help answer some of your questions about how HIPAA relates to your work.

From the Director

The list of HIPAA covered components at Purdue is changing again.

The School of Nursing will be billing electronically in 3 of their clinics, therefore, as of January 1, 2006, we will be covering the Monon Clinic, Trinity United Methodist Clinic and Nursing Center for Family Health. The HIPAA liaison for the School of Nursing clinics is Rhoberta Haley.

In addition, the Speech, Language and Hearing Clinics will be transmitting electronic claims to Medicaid through their involvement in the state’s First Steps program. A date for coverage has not been determined, but planning activities have begun. The HIPAA liaisons for this area will be Barbara Solomon and Lata Krishnan.

Have a wonderful fall!

In early 2006, WorkLife Programs will offer new incentives for Purdue employees to track their personal health. These include personalized health resources and a $100 financial incentive for benefit-eligible faculty, staff and their spouses who complete a health risk appraisal (HRA) and wellness screening. Participation in the health risk appraisal and wellness screening is voluntary.

“Health care services of all kinds have become increasingly expensive during the last few years, and we have to think about our health in different ways,” says Mindy Paulet, director of WorkLife Programs. “These new incentives are investments in the well-being of our faculty, staff and their spouses. By working together to prevent serious injury and illness, we can boost the health of the Purdue community and control rising health care costs.”

To ensure the privacy of participants, Purdue will establish an agreement with an outside vendor to safeguard HRA and wellness screening data according to HIPAA regulations. Purdue will not have access to individual responses.

Watch Inside Purdue and www.purdue.edu/worklife for regular updates during the coming months on how employees and their spouses can participate. Complete information about the $100 incentives is scheduled to be sent to employees’ homes in January.

Purchasing New Software or Making Software or Process Changes?

If either the purchase of new computer software or changes to existing software are planned in your area, and that software stores or provides access to protected health information, please notify your HIPAA liaison immediately.

The HIPAA liaison should contact the ITaP Security and Policy department to be sure that the software’s security features are compliant with HIPAA, GL BA, and FERPA regulation requirements.

The liaison should also notify Joan Vaughan whenever there are material process changes planned in your area.

Where can I find the latest forms and other information about HIPAA?

The HIPAA Privacy Compliance Office has developed a website for Purdue staff to access forms and other HIPAA-related information. To access the site, please visit: http://www.purdue.edu/hipaa or contact: Joan Vaughan, Director, HIPAA Privacy Compliance

telephone: (765) 496-1927

e-mail: jvaughan@purdue.edu
Providing exceptional customer service is an important goal for Purdue employees in any environment. Following are some lessons learned in the tourism industry that apply to the handling of customer information.

**Fair Information Principles**
- **Openness** - Do what you say
- **Collection Limitation** - Collect only what you need and ask first
- **Purpose Specification** - Disclose why you need it
- **Use Limitation** - Use it only for what you stated you would
- **Data Quality** - Keep it accurate
- **Individual Participation** - Let the customer correct it if it is wrong
- **Security Safeguards** - Secure it from unauthorized use
- **Accountability** - Hold employees and partners accountable

**It’s all about Trust**
- Customer’s are increasingly demanding and unforgiving when their personal information is misused
- Trust is earned by protecting the personal information of customers and using it in a privacy sensitive manner
- Trust results in loyal customers that are willing to provide more information
- Loyal and trusting customers generate more revenue
- Customers have choices and will not do business with companies they do not trust

**FAQ of the Month**

**Question:** When is a health care provider a business associate of another health care provider?

**Answer:**

The HIPAA Privacy Rule explicitly excludes from the business associate requirements disclosures by a covered entity to a health care provider for treatment purposes. Therefore, any covered health care provider (or other covered entity) may share protected health information with a health care provider for treatment purposes without a business associate contract. However, this exception does not preclude one health care provider from establishing a business associate relationship with another health care provider for some other purpose. For example, a hospital may enlist the services of another health care provider to assist in the hospital’s training of medical students. In this case, a business associate contract would be required before the hospital could allow the health care provider access to patient health information.

**Health and Human Services’ Scorecard**

In September, the Director of HIPAA Privacy Compliance attended the 11th National HIPAA in Washington DC. At this conference, representatives from Health and Human Services and the Centers for Medicare and Medicaid Services shared statistics regarding their enforcement of the HIPAA regulations.

**Privacy Rule:**
- 14,900 complaints have been received
- 68% have been closed, 32% are open
- Providers are in the top 5 most complained about.

Top complaints include:
- Wrongful denial of access to records
- Disclosure of information not properly authorized
- Inadequate safeguards (i.e. files left out on desks, data on computer screens visible)

**Transactions and Code Sets Standards:**
- 371 complaints have been received

Top complaints include:
- Complaint claims rejections
- Code set issues
- Trading partner issues

**Security Rule:**
- 30 complaints have been received