

UNIVERSITY OF FLORIDA
INFORMATION PRIVACY POLICIES & PROCEDURES
PRIVACY MANAGEMENT

Privacy Personnel Designations

□ POLICY

Rev: 01/01/2008

1. The University of Florida has designated a Chief Privacy Officer who is responsible for the development and implementation of the University's information privacy policies and procedures.
2. As University of Florida job descriptions are reviewed and revised, if job duties involve use and/or disclosure of protected health information or personal identification information, appropriate statements will be added to the job description to reflect this fact and the associated need for specialized training.

□ DEFINITIONS

Coordinator, Education and Training: A member of the University of Florida's staff, appointed to coordinate the training and education related to specific requirements of the privacy regulations and to document the training.

Other Key Contact Personnel: Staff members, appointed in other University of Florida medical components to be responsible for certain designated HIPAA-related tasks more appropriate to the day-to-day operations of those components.

Privacy Analyst: A member of the University of Florida's staff, appointed to

Privacy Auditor: A member of the University of Florida's staff, appointed to perform scheduled and unscheduled audits of mandatory privacy policies, procedures, and practices to monitor and document compliance with specific requirements of the privacy regulations.

Privacy Officer: A member of the University of Florida's staff, appointed to serve as the privacy official for the University, as mandated by the federal privacy regulations.

Security Officer: A member of the University of Florida's staff, appointed to serve as the security official for the University, as mandated by the federal privacy regulations.

□ PRIVACY REQUIREMENTS

Chief Privacy Officer: Job Description

1. **Purpose of Position:** The Privacy Officer is responsible for ensuring that the University of Florida, in its entirety, is compliant with international, federal and state privacy laws, especially HIPAA-related legislation.
2. **Job Responsibilities**
 - The Chief Privacy Officer establishes, implements, manages, and coordinates all privacy-related activities at the University, including the implementation and management of HIPAA-related policies and procedures for covered entity medical components and affiliated covered entities. Assures University adherence and compliance with privacy regulations and organizational policies and procedures, investigates and mitigates privacy incidents, complaints, or breaches, and recommends disciplinary sanctions to University administration. Serves as information privacy consultant to the University for all departments and appropriate entities.

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Privacy Personnel Designations (continued)

- Initiates, facilitates, and promotes activities to foster information privacy awareness. Oversees the design, development, and delivery of integrated privacy-security training. Tracks and reports mandatory privacy training compliance for general awareness, role-based, and research training programs.
- Oversees HIPAA-required Business Associate Agreements for privacy and security business associates.
- Oversees the Privacy Board compliance with HIPAA-related research directives.
- Oversees all risk assessment and internal privacy audits to ensure regulatory compliance. Establishes audit plan and measures success.
- Responsible for university medical record management, including policies and procedures, and compliance with federal initiatives as well as federal and state medical records legislation.
- Oversees the implementation and coordination of HIPAA Administrative Simplification regulations for healthcare billing.
- Regularly collaborates with key university stakeholders and Shands Healthcare about privacy-related issues. Maintains broad understanding of international, federal, and state privacy laws. Monitors advancements in information privacy technologies to ensure organizational adaptation and compliance.
- Works with University administration, legal counsel, and other related parties to represent the university's information privacy interests with external parties. Cooperates with the Office of Civil Rights, other legal entities and university representatives in any compliance reviews or investigations.
- Acts as privacy consultant to healthcare providers throughout Florida.

3. **Qualifications:**

- Master's Degree in Health Administration, Business or other related field, or Law Degree required. Registered Health Information Administrator (RHIA) preferred.
- Experience in health information privacy and/or security with management responsibilities required.
- Extensive familiarity with relevant health care legislation and standards for the protection of health information and patient privacy required.
- Experience in an academic medical center preferred.
- Extensive knowledge of legal and regulatory issues as they relate to healthcare required. An understanding of network and system security, especially as it relates to the health information environment required.
- Ability to work effectively in a collegial, consensus-driven organization required.
- Excellent verbal and written communication skills, as well as interpersonal skills required. Must be able to problem-solve, prioritize assignments and effectively manage projects.

Coordinator, Education and Training: Job Description

1. **Purpose of the Position:** To organize and coordinate the provision of appropriate education and training to faculty, staff, students, and volunteers, pursuant to the requirements of the HIPAA regulations and according to the University of Florida Privacy Training and Education policy.

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Privacy Personnel Designations (continued)

2. Job Responsibilities

- Formulate, present, document, and report the educational activities required by the privacy regulations, as needed.
- Develop and implement educational policies and procedures for the University of Florida Privacy Office.
- Assist with the design of forms and procedures pertinent to the implementation of policies established by the Privacy Office.

3. Qualifications

- Master's Degree or Bachelor's Degree and two years appropriate experience.
- Certified Professional Trainer or previous experience with adult professional education strongly desired.

Privacy Analyst: Job Description

1. **Purpose of the Position:** To investigate reported incidents and complaints related to state and federal privacy laws, and University of Florida policies and procedures regarding the privacy of health and personal information.

2. Job Responsibilities

- Serve as delegated Privacy Breach Notification Coordinator.
- Assist Chief Privacy Officer with investigating HIPAA and privacy incidents and complaints.
- Maintain the documentation for privacy incident investigations, resolutions, and sanctions.

3. Qualifications

- Master's Degree or Bachelor's Degree and two years appropriate experience.
- Minimum two years experience in health care environment.
- Certified HIPAA Professional preferred.

Privacy Auditor: Job Description

1. **Purpose of the Position:** To audit compliance with state and federal privacy laws, as well as University of Florida policies and procedures regarding the privacy of health and personal information.

2. Job Responsibilities

- Assist with the design and implementation of the audit strategic plan for the Privacy Office.
- Formulate, conduct, document, and report on auditing activities related to the privacy regulations, including, but not limited to:
 - Identifying and assessing privacy risks
 - Planning and conducting operational privacy-related audits
 - Compiling audit work-papers and reporting findings and recommendations
- Maintain liaison with UF colleges and departments, UF Information Technology groups, and Shands HealthCare system to coordinate and complete investigative reviews.

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3. **Qualifications**

- Master's Degree or Bachelor's Degree and two years appropriate experience.
- Minimum two years experience in health care environment.
- Certified Internal Auditor preferred.

REFERENCES

HIPAA Regulations: 45 CFR § 164.530(a) (Personnel Designations), § 164.308(a)(2) (Assigned Security Responsibility)

EXHIBITS None