I. Description

The UNCHCS Privacy Office may revise, amend and otherwise modify the UNCHCS HIPAA Policies as is necessary or appropriate to comply with federal or state laws, including but not limited to the federal Health Insurance Portability and Accountability Act of 1996, as amended, and applicable regulations promulgated thereunder (collectively, "HIPAA"), the federal Health Information Technology for Economic and Clinical Health Act ("HITECH"), the federal Genetic Information Nondiscrimination Act ("GINA") and the North Carolina Identity Theft Protection Act ("NCITPA").

Included within the scope of this policy are the patient care programs of the UNC School of Medicine (UNC SOM). As a result, this policy shall apply to all UNC SOM personnel, including but not limited to faculty, staff, students, trainees, interns and volunteers who may be full-time, part-time, paid or unpaid who create, store, transmit, access or use any patient information in support of clinical purposes for UNCHCS or any other healthcare entity.
II. Policy

A. Authority to Amend or Change UNCHCS HIPAA Policies. UNCHCS will revise its privacy policies and procedures as needed to maintain compliance with changes in applicable laws. Privacy policies and procedures shall be reviewed periodically at least every three years, and revised as needed. Any changes in privacy policies and/or procedures shall be documented and published in the UNCHCS HIPAA Manual as soon as possible and reasonable efforts shall be made to communicate the changes to individuals who may be affected by such changes. The revision date of privacy policies and procedures shall appear on each policy.

B. Changes in the Law. Upon notice of a change in the law that affects one or more UNCHCS HIPAA Privacy Policies, the UNCHCS Privacy Office shall promptly review and revise all relevant UNCHCS Privacy Policies and Procedures to comply with the changes in the law.

C. Material Changes in the Law. If a change in the law materially affects the uses or disclosures of PHI, an individual's rights, UNCHCS's or any UNCHCS Facility's legal duties, or the content of the UNCHCS Notice of Privacy Practices, the UNCHCS Privacy Office shall make the appropriate changes to the UNCHCS Notice of Privacy Practices and coordinate and oversee the redistribution of the Notice for and provide instruction for all UNCHCS Facilities on such changes in accordance with the UNCHCS Notice of Privacy Practices Policy.

D. Effect of Policy Changes Resulting in Changes to Notice of Privacy Practices. When one or more UNCHCS Facility changes a policy or privacy practice that is stated in the UNCHCS Notice of Privacy Practices, the changes will be effective for PHI that was created or received prior to the effective date of the revision to the Notice of Privacy Practices since UNCHCS has included in its Notice of Privacy Practices a statement reserving the right to make such a change in the Notice of Privacy Practices.

III. Definitions

None

IV. References

45 C.F.R. § 164.530(i)(3)

V. Related Policies/Forms

Notice of Privacy Practices Policy

Attachments: No Attachments

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<td>Step Description</td>
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<td>Jerylyn Williams: VP Chief Audit &amp; Comp Officer</td>
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Applicability

Caldwell Memorial Hospital, Chatham Hospital, Johnston Health, Nash Health Care, UNC Health Care System, UNC Lenoir Health Care, UNC Medical Center, UNC Physicians Network, UNC Rex Healthcare, UNC Rockingham Health Care, Wayne Memorial Hospital