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Owner: *David Behinfar: HCS Exec Dir Privacy*
Policy Area: *HIPAA - Privacy*
Policy Tag Groups:
Applicability: *UNC Health Care System (all owned and managed entities)*

Changes to Privacy Program Policies

APPLICABILITY:

This policy applies to the following entities (collectively referred to as "UNC Health" in this policy):

✓ UNC Health Care System / UNC Medical Center*	✓ Johnston Health
✓ UNC Physicians Network	✓ Lenoir Memorial Hospital
✓ UNC Physicians Network Group Practices / UNC Physicians Group Practices II	✓ Margaret R. Pardee Memorial Hospital
✓ Rex Healthcare / Rex Hospital	✓ Nash Healthcare System/Nash Hospitals
✓ Chatham Hospital	✓ Wayne Memorial Hospital
✓ Caldwell Memorial Hospital	
✓ UNC Rockingham Health Care / UNC Rockingham Hospital	

***UNC Medical Center includes all UNC Hospitals' facilities and the clinical patient care programs of the School of Medicine of UNC-Chapel Hill (including UNC Faculty Physicians).**

I. Description

The UNC Health Privacy Office may revise, amend and otherwise modify the UNC Health 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 UNC Health or any other healthcare entity.

II. Policy

- A. **Authority to Amend or Change UNC Health HIPAA Policies.** UNC Health 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 UNC Health 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 UNC Health HIPAA Privacy Policies, the UNC Health Privacy Office shall promptly review and revise all relevant UNC Health 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, UNC Health's or any UNC Health Facility's legal duties, or the content of the UNC Health Notice of Privacy Practices, the UNC Health Privacy Office shall make the appropriate changes to the UNC Health Notice of Privacy Practices and coordinate and oversee the redistribution of the Notice for and provide instruction for all UNC Health Facilities on such changes in accordance with the UNC Health [Notice of Privacy Practices](#) Policy.
- D. **Effect of Policy Changes Resulting in Changes to Notice of Privacy Practices.** When one or more UNC Health Facility changes a policy or privacy practice that is stated in the UNC Health 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 UNC Health 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

Approval Signatures

Step Description	Approver	Date
	Jerylyn Williams: Chief Audit & Compliance Ofcr	06/2020
SYSTEM Site Administrator	Emilie Hendee: HCS Attorney Sr	06/2020
	David Behinfar: HCS Exec Dir Privacy	06/2020

Applicability

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

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