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

<table>
<thead>
<tr>
<th>Step Description</th>
<th>Approver</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Jerylyn Williams: Chief Audit &amp; Compliance Ofcr</td>
<td>06/2020</td>
</tr>
<tr>
<td>SYSTEM Site Administrator</td>
<td>Emilie Hendee: HCS Attorney Sr</td>
<td>06/2020</td>
</tr>
<tr>
<td></td>
<td>David Behinfar: HCS Exec Dir Privacy</td>
<td>06/2020</td>
</tr>
</tbody>
</table>

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