



**Origination:** 07/2018  
**Effective:** 06/2020  
**Last Approved:** 06/2020  
**Last Revised:** 06/2020  
**Next Review:** 06/2023  
**Owner:** *David Behinfar: HCS Exec Dir Privacy*  
**Policy Area:** *HIPAA - Privacy*  
**Policy Tag Groups:**  
**Applicability:** *UNC Health Care System (all owned and managed entities)*

## Use and Disclosure of Immunization Records

### 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

To comply with HIPAA and other applicable law regarding the disclosure of immunization records.

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. **Permissible Disclosure to School.** UNC Health may disclose immunization records to a school about an individual who is a student or prospective student of the school, if the school is required by law to obtain proof of immunization for admission purposes.

B. **Consent.** The individual (or parent or guardian) must first agree to the disclosure. The agreement may be in writing or made verbally and documented by UNC Health. A HIPAA compliant authorization is not required.

### III. Definitions

None

### IV. References

HIPAA Privacy Rule: 45 CFR 164.512(b)(1)(vi).

N.C. Gen. Stat. § 130A-153; 10A N.C. Admin. Code 41A.0406

### V. Related Policies/Forms

None

#### 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