

Rock Valley College

Health Insurance Portability and Accountability Act (HIPAA) Procedure RVC Administrative Procedure (3:30.020)

Overview

Rock Valley College has adopted a policy that protects the privacy and confidentiality of protected health information (PHI) whenever it is used by the organization. The private and confidential use of such information will be the responsibility of all individuals with job duties requiring access to PHI in the course of their jobs.

Definitions

Protected Health Information Defined: PHI refers to individually identifiable health information received by the organization's group health plans or received by a health care provider, health plan or health care clearinghouse that relates to the past or present health of an individual or to payment of health care claims. PHI information includes medical conditions, health status, claims experience, medical histories, physical examinations, genetic information and evidence of disability.

Health Insurance Portability and Accountability Act (HIPAA): a U.S. law that protects the privacy and security of individuals' health information and sets standards for how that information is shared

The HIPAA Compliance Officer

Rock Valley College has designated the Benefits Coordinator as the HIPAA Compliance Officer (HCO), and any questions or issues regarding PHI should be presented to the HCO for resolution. The HCO is also charged with the responsibility for:

- Issuing procedural guidelines for access for PHI.
- Developing a matrix for personnel who will need access to PHI.
- Developing guidelines for describing how and when PHI will be maintained, used, transferred or transmitted.

Activities Necessitating Use of PHI

Activities that may require the use or transmission of PHI will be maintained in confidence. Employees will not disclose PHI, used for employment-related actions, except as provided by procedures approved by the HCO. General rules follow:

Disclosures that do not qualify as PHI-protected disclosures include:

- Disclosure of PHI to the individual to whom the PHI belongs.
- Requests by providers for treatment or payment.
- Disclosures requested to be made to authorized parties by the individual PHI holder.
- Disclosures to government agencies for reporting or enforcement purposes.
- Disclosures to workers' compensation providers and those authorized by the workers' compensation providers.

Rock Valley College

- Information regarding whether an individual is covered by a plan for claims processing purposes may be disclosed.
- Information external to the health plan is not considered PHI if the information is being furnished for claims processing purposes involving workers' compensation or short- or long-term disability and medical information received to verify Americans with Disabilities Act (ADA) or Family and Medical Leave Act (FMLA) status.

Records Retention

In accordance with state and federal laws, personnel records and disclosures of PHI will be maintained for a period of five years following employee exit from the organization. Hepatitis B Vaccination will be maintained for a period of 30 years following employee exit from the organization. Records that have been maintained for the maximum interval will be destroyed in a manner to ensure that such data are not compromised in the future in accordance with RVC Board Policy 2:40.060: Disposal of Assets.

Reference: Board Policy 3:30.020

Implemented: March 23, 2004

Revised: October 9, 2025