



Issuing Department: Internal Audit, Compliance, and Enterprise Risk Management

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HIPAA Privacy Policies, Procedures, and Documentation

Policy

NYU Langone Health is committed to protecting the rights of our patients. In compliance with the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), the Health Information Technology for Economic and Clinical Health Act (“HITECH”) and applicable federal and state laws and regulations (together, the “HIPAA Rules”), this policy sets forth NYU Langone Health’s practice of implementing, enforcing, updating, and documenting its compliance with the HIPAA Rules through these HIPAA Privacy Policies and Procedures.

- NYU Langone Health implements policies and procedures that are reasonably designed to ensure compliance with the HIPAA standards, requirements, and implementation specifications.
- NYU Langone Health monitors changes to the HIPAA Rules and promptly revises its policies and procedures and, if required, the Notice of Privacy Practices.
- NYU Langone Health will maintain documentation required for HIPAA compliance for a minimum period of six (6) years from the date of the creation of the document or the date the document was last in effect, whichever is later. Documentation will be retained in the patient’s medical record, by the Office of Internal Audit, Compliance, and Enterprise Risk Management (“IACERM”), or other appropriate department based on the type and purpose of the documents and in otherwise in accordance with NYU Langone Health record retention policies.

NYU Langone Health, as used in these policies, includes: NYU Langone Health System, NYU Langone Hospitals (including the NYU Health Care Agency, NYU Grossman School of Medicine an administrative division of New York University (“NYUGSOM”), Sunset Park Health Council (d/b/a the Family Health Centers at NYU Langone Health) (“FHC”), and the Southwest Brooklyn Dental Practice (“SBDP”), and any entities controlled by any of them except where specifically excluded.

For HIPAA purposes, NYU Langone Hospitals and NYUGSOM are designated as a single Affiliated Covered Entity (“ACE”). The ACE also participates in an Organized Health Care Arrangement (“OHCA”) with the FHC and the SBDP. With respect to the applicability of these policies to the FHC and SBDP, the appropriate FHC committee and board has approved. NYU Langone Health System and the NYU Langone MSO, Inc. are Business Associates of the covered entities in the OHCA.

Some entities may also have additional operational procedures that are site specific, in order to properly implement these privacy policies.

Applicability

These HIPAA Privacy Policies and Procedures apply to all members of the NYU Langone Health community, including employees, trustees, officers, faculty, medical staff, residents, fellows, students, volunteers, trainees, vendors, contractors, consultants, sponsored individuals, and agents of NYU Langone Health. Policies that address patients' rights apply for any patient of NYU Langone Health at any of its locations.

Enforcement

NYU Langone Health's Privacy Officer has general responsibility for implementation of all Internal Audit, Compliance, and Enterprise Risk Management ("IACERM") HIPAA Privacy Policies and Procedures.

Individuals who are found to be noncompliant with these HIPAA Privacy Policies and Procedures may be subject to disciplinary action up to and including termination of employment or association with NYU Langone Health.

These policies shall remain in effect unless terminated or superseded by a revised and/or updated policy issued by IACERM.

Related Documents

All HIPAA Privacy Policies and Procedures
Medical Center Information Technology Security Policies
Medical Center Information Technology Workforce Members IT Policy
NYU Langone Health Notice of Privacy Practices
Privacy, Information Security, and Confidentiality Statement

Legal Reference

45 C.F.R. §164.530(i)
45 C.F.R. §164.530(j)

This version supersedes all NYU Langone Health (as defined in this Policy) previous policies, including but not limited to NYU Hospitals Center, New York University School of Medicine, Lutheran Medical Center, and Winthrop University Hospital.