

**UNIVERSITY OF KANSAS
WATKINS HEALTH SERVICES
ADMINISTRATION**

NUMBER: <p style="text-align:center">AD- 312</p>	ISSUE DATE: <p style="text-align:center">03/2003</p>
TITLE: <p style="text-align:center">Disclosures of PHI to KU Support Services of the University of Kansas, Lawrence Campus</p>	REVISED: <p style="text-align:center">3/8/2010</p>
TITLE OF OWNER/AUTHOR: <p style="text-align:center">Director</p>	APPROVED: <p style="text-align:center">Director</p>

PURPOSE:

To define the appropriate measures to be undertaken in order to transfer protected health information (PHI) to other clinics, facilities or departments (support services) at the University of Kansas-Lawrence Campus.

POLICY:

The transfer of PHI between University clinics, facilities or departments should be handled in the same manner as disclosures to a legally separate entity and in accordance with state and federal laws.

Watkins Health Services (WHS) will:

1. Identify the support services at the University of Kansas-Lawrence Campus to which PHI will be disclosed and receive the necessary assurances that the support service will:
 - 1.1. Identify and document (by title) those individuals who require access to the PHI maintained by WHS.
 - 1.2. Take appropriate steps to safeguard the information and limit the sharing of PHI beyond the individuals identified.
 - 1.3. Ensure that the identified individuals receive education regarding the requirements of applicable state and Federal privacy laws
 - 1.4. Notify Watkins Health Services and the appropriate University officials if there has been a breach.
2. The support services may not use or disclose PHI in a manner that WHS could not or in a manner that is prohibited by University guidelines or state or Federal law.

The identified support services are:

- Internal Audit
- Office of the General Counsel
- Comptroller
- Information Technology

REFERENCES:

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