PURPOSE:
To define the appropriate measures to be undertaken in order to transfer 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.

Student Health Services (SHS) 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:
   a. Identify and document (by title) those individuals who require access to the PHI maintained by SHS.
   b. Take appropriate steps to safeguard the information and limit the sharing of PHI beyond the individuals identified.
   c. Ensure that the identified individuals receive education regarding the requirements of applicable state and Federal privacy laws.
   d. Notify Student 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 SHS 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