HIPAA

Palmer College of Chiropractic (College) is committed to identifying and evaluating the likelihood and consequences of threats to the security of Protected Health Information (PHI) and implementing reasonable and appropriate measures to safeguard the confidentiality, availability, and integrity of that information.

The College will safeguard information in a manner consistent with applicable law, including the Health Insurance Portability and Accountability Act (HIPAA). As such, Palmer will adopt and implement HIPAA security procedures. All employees and students are responsible to know and comply with this HIPAA policy (Policy) and any associated HIPAA security procedures specified by the College.

SCOPE

This Policy applies to the entire College community, which is defined as including the Davenport campus (Palmer College Foundation, d/b/a Palmer College of Chiropractic), West campus (Palmer College of Chiropractic West) and Florida campus (Palmer College Foundation, Inc., d/b/a Palmer College of Chiropractic Florida) and any other person(s), groups, or organizations affiliated with any Palmer campus.

DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings specified below:

> The term “College” refers to Palmer College of Chiropractic, including operations on the Davenport campus; Florida campus; and West campus.

ADMINISTRATIVE RULES

Complete information regarding additional HIPAA policies, procedures and protocols may be accessed online as indicated below.

Privacy Policies

> Creation of Limited Data Set Under the HIPAA Privacy Rule

> De-Identification of Protected Health Information Under the HIPAA Privacy Rule

> Designated Record Set
> Designation of the Palmer College of Chiropractic Affiliated Covered Entity (ACE)
> Designation of the Palmer College of Chiropractic Health Care Component (HCC)
> HIPAA Breach Policy and Procedures
> Managing Arrangements of Business Associates with Palmer College of Chiropractic
> Marketing with The Use of Protected Health Information
> Notice of Privacy Practices (NPP) Distribution and Acknowledgement
> Requests by Patients for Alternative Confidential Communications
> Requests by Patients for an Accounting of Certain Disclosures
> Requests by Patients for Restrictions on Uses and Disclosures of Protected Health Information
> Requests by Patients to Amend Protected Health Information
> Sale of Protected Health Information
> The Minimum Necessary Standard
> Use of and Safeguards for Protected Health Information by Palmer College of Chiropractic Internal Business Support Personnel
> Uses and Disclosures of Protected Health Information for Education and Training
> Uses and Disclosures of Protected Health Information for Fundraising
> Uses and Disclosures of Protected Health Information Not Requiring Patient Authorization or an Opportunity to Agree or to Object
> Uses and Disclosures of Protected Health Information That Require Patient Authorization (Clinical Non-Research and Clinical Research)
> Uses and Disclosures of Protected Health Information That Require Patient Authorization or an Opportunity to Agree or to Object
> Verifying Identity and Authority of Persons Seeking Disclosure of a Patient’s Protected Health Information (PHI)

**Security Policies**

> Email Communications Involving Protected Health Information

> HIPAA Security Auditing

> HIPAA Privacy and Security Training

> HIPAA Security Contingency Planning

> HIPAA Security Data Management

> HIPAA Security Facilities Management

> HIPAA Security Oversight

> HIPAA Security Risk Management

**STANDARD INSTITUTIONAL POLICY PROVISIONS**

Institutional policies are supplemented by provisions that are applicable to all institutional policies. It is the responsibility of all employees and students to know and comply with these standards.

> Standard Provisions Applicable to All Institutional Policies
Additional Information

ASSOCIATED POLICIES, PROCESSES AND/OR PROCEDURES

This Policy is supplemented below. It is the responsibility of all employees and students to know and comply with policies and procedures as supplemented.

POLICIES

> Confidential Information

PROCESSSES AND/OR PROCEDURES

> Encryption and File Security

> HIPAA Procedures and Protocols

FORMS/INSTRUCTIONS

> N/A

OTHER RELATED INFORMATION

> HIPAA Training Tutorial - Students

> HIPAA Training Tutorial – Employees and Palmer Partners

CONTACTS

Security Officers

> Davenport, Iowa campus
James Mountain
Director of Information Security
1000 Brady Street
Davenport, IA  52803
(563) 884-5728
james.mountain@palmer.edu
> Davenport, Iowa Clinics
Larry Swank, D.C., M.S.
1000 Brady Street
Davenport, IA  52803
(563) 884-5721
larry.swank@palmer.edu

> Florida Clinics, Port Orange, Fla.
Matt Kellen
4705 S. Clyde Morris Blvd.
Port Orange, FL  32129-4153
(386) 763-2640
matt.kellen@palmer.edu

> West Clinics, San Jose, Calif.
Kelly Goetz
90 E. Tasman Drive
San Jose, CA  95134
(408) 944-6104
kelly.goetz@palmer.edu

**Privacy Officers**

> Davenport, Iowa Clinics
Shayan Sheybani, D.C., M.B.A., FACO
1000 Brady Street
Davenport, IA  52803
(563) 884-5701
shayan.sheybani@palmer.edu

> Florida Clinics, Port Orange, Fla.
Shane Carter, D.C.
4705 S. Clyde Morris Blvd.
Port Orange, FL  32129-4153
(386) 763-2628
shane.carter@palmer.edu
> West Clinics, San Jose, Calif.
Gregory Snow, D.C.
90 E. Tasman Drive
San Jose, CA  95134
(408) 944-6062
gregory.snow@palmer.edu

> Research
Robert Vining, D.C.
1000 Brady Street
Davenport, IA  52803
(563) 884-5690
robert.vining@palmer.edu

> Senior Director for Human Resources
1000 Brady Street
Davenport, IA  52803
(563) 884-5866

**HISTORY**

Revised: ............................................................................................................................ January 3, 2018

Revised: ............................................................................................................................ March 14, 2010

Revised: ............................................................................................................................ February 2, 2010

Adopted: .......................................................................................................................... N/A

Last Administrative Review: .................................................................November 4, 2009

Responsible Officer: ................................................................. Dan Weinert, M.S., D.C., Ph.D.
Provost
Palmer College of Chiropractic
1000 Brady Street
Davenport, Iowa
Phone: (563) 884-5761
dan.weinert@palmer.edu
Issuing Office: ......................................................................................................... Office of Compliance

Earlye Julien, PHR, M.S.Ed., CQIA
Senior Director for Compliance
Palmer College of Chiropractic
1000 Brady Street
Davenport, Iowa
Phone: (563) 884-5476
Fax: (563) 884-5883
earlye.julien@palmer.edu