

Good morning –

Late last week, the Office for Civil Rights announced a \$400,000 action against a hospital for HIPAA violations. OCR's investigation found the following:

Woman & Infants Hospital of Rhode Island (WIH) lost unencrypted backup tapes containing the ultrasound studies of approximately 14,000 individuals, including patient name, data of birth, date of exam, physician names, and, in some instances Social Security Numbers. WIH's business associate provided centralized corporate support including technical support and information security for WIH's information systems but WIH did not have a business associate agreement in place that was current and therefore, it did not incorporate revisions required under revisions to HIPAA.. WIH had failed to renew or modify its existing written business associate agreement to include the applicable implementation specifications required by the HIPAA Privacy and Security Rules.

Please use this as a reminder to:

1. **Ensure** that ALL portable devices, including backup tapes, that store PHI are encrypted. Please contact your Tier 1 or IT representative if you need assistance with encryption or with finding alternative secure storage solutions.

AND

2. **Confirm** that your Business Associate Agreements (and related service agreements) have not expired. Don't forget: It is each department's responsibility to let Purchasing know when it would like to renew a service agreement and to inform Purchasing that PHI is involved, so Purchasing knows to add the current Business Associate Agreement to the renewal.

Thank you for your assistance in ensuring the PHI maintained by the University is protected.

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