

**From:** [Raines, Jill \(HSC\)](#)

**Subject:** Use a Pcard? Please consider this!  
**Date:** Monday, April 24, 2017 7:39:14 AM

---

Good morning -

Last week, the Office for Civil Rights fined a small Illinois pediatric subspecialty practice for sharing PHI with a vendor without having a Business Associate Agreement (BAA) in place. The vendor had been hired to store paper medical records for the practice more than 10 years ago. A few years ago, the vendor was investigated by state's attorney general for allegedly throwing away records that contained PHI. In response, the Office for Civil Rights began investigating the vendor and reviewing who the vendor did business with versus who the vendor had a BAA in place with. Neither the vendor nor the pediatric practice could produce a BAA, but both agreed that the vendor had been storing the practice's PHI.

**Please use this as another reminder to review *all* of the services your clinic or department utilizes that involve PHI – particularly those services you pay for with a Pcard.** If those services include PHI held or created by the University, it's likely you need a BAA. You can confirm whether you have a BAA in place with a particular vendor by contacting the Purchasing Department. Not sure whether you need a BAA? Contact me, Marty Walton ([marty-walton@ouhsc.edu](mailto:marty-walton@ouhsc.edu)), or Valerie Golden ([Valerie-golden@ouhsc.edu](mailto:Valerie-golden@ouhsc.edu)) and we will assist.

Thank you for your assistance in ensuring the University continues to protect its patient, research participant, and health plan enrollee information.

*Jill Bush Raines*

Assistant General Counsel, Office of Legal Counsel  
and University Privacy Official  
The University of Oklahoma  
1000 S.L. Young Blvd., Room 221  
Oklahoma City, OK 73117  
(405) 271-2033  
(405) 271-1076 (fax)  
[jill-raines@ouhsc.edu](mailto:jill-raines@ouhsc.edu)

**CONFIDENTIALITY NOTICE:** This email, which includes any files transmitted with it, contains confidential information from University Legal Counsel, is intended solely for the use of the individual or entity to whom it is addressed, and may contain information protected by the attorney-client privilege or work product doctrine. If you are not the intended recipient or the person responsible for delivering this email to the intended recipient, be advised that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error, please notify the sender immediately by a "reply to sender only" message and destroy all electronic and hard copies of this email and any attached files.