

To: Melissa J. Perry, Chair, Department of Environmental and Occupational Health; Alan E. Greenberg, Chair, Department of Epidemiology and Biostatistics; Loretta DiPietro, Chair, Department of Exercise and Nutrition Sciences; James M. Tielsch, Chair, Department of Global Health and Management; Leighton Ku, Acting Chair, Department of Health Policy and Management; Rajiv N. Rimal, Chair, Department of Prevention and Community Health

From: Kimberly A. Horn, Associate Dean of Research

Re: HIPAA Training

Date: July 7, 2015

CC: Lynn Goldman, Dean, George Guzman, Director of Compliance and Data Privacy, Sheila Garrity, Associate Vice President for Research Integrity, Carley Emerson, Director, Office of Human Research, Laura Davis, Senior Research Operations Director

Effective immediately, the GW Milken Institute School of Public Health (MSPH), in partnership with the GW Office of Compliance and Privacy and the Office of the Senior Vice President will provide annual HIPAA (Health Insurance Portability and Accountability Act) training to all MSPH faculty, staff, and student wage employees who conduct research with protected health information (PHI) connected to covered entities.

Why is HIPAA relevant to MSPH research? As many of you know, HIPAA regulates how covered entities use and disclose protected health information (PHI) in any format, orally, on paper, or electronically. The “Privacy Rule” a Federal regulation under the HIPAA was issued to protect the privacy of health information that identifies individuals who are living or deceased. MSPH has in its research portfolio studies that interface with covered entities. For details on “Protecting Personal Health Information in Research: Understanding the HIPAA Privacy Rule” refer to: http://privacyruleandresearch.nih.gov/pr_02.asp.

What is a covered entity? Covered entities are defined in the HIPAA rules as (1) health plans, (2) health care clearinghouses, and (3) health care providers who electronically transmit any health information in connection with transactions for which HHS has adopted standards. Generally, these transactions concern billing and payment for services or insurance coverage (e.g., via hospitals, academic medical centers, and other health care providers).

Is MSPH a covered entity? MSPH is not a covered entity. However, if a study uses any data generated from or connected with a covered entity those data must be protected under HIPAA.

What is PHI? PHI data may include:

- Name
- Geographic information smaller than state
- Elements of dates (birth date, admission date, date of death, ages > age 90)
- Telephone numbers
- Fax numbers
- Email addresses
- Social security numbers
- Medical record numbers
- Account numbers
- Certificate or license number
- Vehicle identifiers and serial numbers including license plate
- Device identifiers and serial numbers
- URLs
- IP address numbers
- Biometric identifiers
- Full face photographic images and comparable images
- Health plan beneficiary numbers
- Any other unique identifying number, characteristic, or code

Why is HIPAA training required? Recent changes to HIPAA implemented under the Health Information Technology for Economic and Clinical Health Act (HITECH Act) require annual HIPAA training to all individuals who come into contact with PHI connected in any way to a covered entity. Therefore, GW must make this training available to its researchers.

Who is required to complete the training? If your research uses PHI data generated from or connected with a covered entity, you must complete the training annually. PIs are responsible for assurance that all key personnel and project staff who interact with the PHI data also complete the training.

How is the training offered? To meet these training requirements, MSPH will have access to training hosted on CITI using the Health Information and Privacy (HIPS) course. The course is accessed through GW's CITI site: <http://humanresearch.gwu.edu/collaborative-irb-training->

[initiative-citi](#). Training takes about one hour to complete. The training must be completed by July 30, 2015, and then completed annually. Upon completion a certificate is issued.

Certificates of completion must be sent to comply@gwu.edu within two weeks of completion of training. If you have already taken the CITI Health Information and Privacy (HIPS) course in this current fiscal year, then you are exempted from this year's training requirement. If so, please print out your CITI HIPS completion certificate and email pdf to comply@gwu.edu by July 15, 2015. If a study has multiple key personnel and staff who conduct research using PHI, the PI must ensure that all certificates are sent.

We appreciate your assistance with this important effort. If you have any questions, please contact Laura Davis (IRDavis@gwu.edu) in the MSPH Office of Research Excellence or the GW Office of Compliance and Privacy at 202-994-3386 or comply@gwu.edu