

# Tulane University

<b>DEPARTMENT:</b> General Counsel's Office -- HIPAA	<b>POLICY DESCRIPTION:</b> Business Associates Agreement
<b>PAGE:</b> 1 of 1	
<b>APPROVED:</b> April 1, 2003	<b>REVISED:</b> November 29, 2004, December 1, 2008, October 27, 2009
<b>EFFECTIVE DATE:</b> April 14, 2003	<b>POLICY NUMBER:</b> GC-017

## Tulane University Business Associates Agreement

### SCOPE OF POLICY

This policy applies to Tulane University Medical Group, its participating physicians and clinicians, and all University employees and business units who provide management, administrative, financial, legal, and operational support to or on behalf of Tulane University Medical Group and have been designated as part of the Tulane University HIPAA Health Care Component.

### STATEMENT OF POLICY

All business associates of the Tulane University HIPAA Health Care Component will be required to sign a business associate agreement consistent with the Health Insurance Portability and Accountability Act, the Standards for Privacy of Individually Identifiable Health Information, the HIPAA Security Standards (where applicable), and any and all other federal regulations and interpretive guidelines promulgated thereunder.

### IMPLEMENTATION OF POLICY

The General Counsel's Office processes all Business Associate Agreements. The General Counsel's Office will therefore identify those parties that must execute business associate agreements with Tulane University Medical Group. In addition, any request that Tulane University or Tulane University Medical Group sign a Business Associate Agreement should be directed to the General Counsel's Office.

1. New Business Associates who provide services to the Tulane University Medical Group will be required to sign and return the E-Business Associate Agreement (see Attachment "A"), which will be sent to them by the Office of the Privacy Official. This Business Associate Agreement covers the provisions for all PHI (Protected Health Information), whether oral, on paper, or electronic.
2. Business Associates who have previously signed a Standard Business Associate Agreement, but who have since been identified as providing services that involve the receipt, transmission, or manipulation of "*Electronic Protected Health Information*" will be required to sign and return an Addendum (see Attachment "B") covering the use and disclosure of Electronic PHI, which will be sent to them by the Office of the Privacy Official.

NOTE: An up-to-date list of TUMG Business Associates is maintained in the Office of the Privacy Official.