

Privacy, Confidentiality, and Information Security Agreement

It is the responsibility of all UW Medicine workforce members to protect the privacy, security, and confidentiality of any information to which they are given access. All UW Medicine workforce members (including faculty, employees, trainees, volunteers, and other persons who perform work for UW Medicine) who utilize computing systems, resources, and data, are responsible for the confidentiality and security of their User ID (s) and Password(s) which provide access to University of Washington and/or UW Medicine computer systems. It is also the responsibility of all workforce members to protect the confidentiality of the information they are provided using those credentials. Examples of access credentials are the UW Net ID and password and the UW Medicine login and password. **I understand and acknowledge the following:**

Policies and Regulations:

- I will comply with UW and UW Medicine policies.
Privacy: <http://depts.washington.edu/comply/privacy.shtml>
Information Security: <http://security.uwmedicine.org/Policies/default.asp>
- I will support compliance with federal and state statutory and regulatory requirements (45 CFR Parts 160 and 164, American Recovery and Reinvestment Act of 2009 (ARRA) Health Information Technology for Economic and Clinical Health (HITECH) Act).
- I will report all known privacy violations to the UW Medicine Compliance Privacy Program – 206 543-3098 or comply@uw.edu.
- I will report all suspected security events and security policy violations to my IT Support/Help Desk.

Confidentiality of Information:

- I will limit my access, use, and disclosure of patient information to the minimum amount necessary to perform my authorized activity or duty.
- I will maintain the confidentiality of all information, including patient information, confidential information, restricted information, and/or proprietary information to which I am given access privileges.
- I will use and/or disclose patient, confidential, or restricted information only as allowed by my job duties.
- I will only discuss patient, confidential, or restricted information in the work place and only with those who have a need-to-know and the authority to receive the information.
- I will take care to discuss patient, confidential, or restricted information in a private setting and not hold such conversations where they can be overheard by those without a need-to-know.

Inappropriate Use or Disclosure:

- I will report any improper access or disclosures to Compliance.
- I understand that my access will be monitored to assure appropriate use.

Computer Access Privileges:

- I will ensure that my use of UW & UW Medicine computers, email, computer accounts, networks, and information accessed, stored, or used on any of these systems is restricted to authorized duties or activities.
- I will only use my UW, UW Medicine or affiliates email account to conduct work related responsibilities and will not forward my email account or individual business related emails to a non-UW, UW Medicine or affiliates email account (e.g. personal email account or other employer provided email account).
- I will not electronically access the records of any person if not an assigned or job-related duty.
- I will not electronically access the UW Medicine records of my family members, including minor children, except for assigned job related duties. This also applies in cases where I may hold authorization or other legal authority from the patient.

The following table is a glossary of terms used in the Privacy, Confidentiality, and Information Security Agreement.

Policies and Standards References:

1. University of Washington Administrative Policy Statements (APS):
 - APS 2.4 Information Security and Privacy Roles, Responsibilities, and Definitions
 - APS 2.5 Information Security and Privacy Incident Management Policy
 - APS 2.2 Privacy Policy
2. UW Medicine Privacy Policies: <http://depts.washington.edu/comply/privacy.shtml>
3. UW Medicine Information Security Policies & Standards:
http://security.uwmedicine.org/policies/sec_policies.asp

Term	Definition
Access	To use, change, or view information.
Authorized duties or activities	Duties or activities that are established by those with appropriate authority related to the role or function of the workforce member, like a supervisor, manager or director.
Authorized software	Software that is authorized for use by the designated System Owner or Department Manager.
CONFIDENTIAL Information	CONFIDENTIAL Information is information that is very sensitive in nature, and requires careful controls and protection. Unauthorized disclosure of this information could seriously and adversely impact UW Medicine or interests of patients, other individuals, and organizations associated with UW Medicine. Examples include: personally identifiable information, patient information, workforce records, student records, social security numbers, legally protected University records, research data, passwords, intellectual property.
Confidentiality	Expectation that information will be protected from unauthorized use or disclosure.
Disclose	Release, transfer, provision of access to, or divulging information in any other manner outside the entity.
Licensed software	Software that the University of Washington has been granted permission from the owner to use under a written license agreement or contract.
Minimum amount of information necessary	<p>Minimum Necessary Standard: When using or disclosing patient information, UW Medicine must make reasonable efforts to limit patient information to the minimum necessary to accomplish the intended purpose of the use, disclosure or request.</p> <p>The minimum necessary standard does not apply to</p> <ul style="list-style-type: none"> • Disclosures to or requested by a health care professional for treatment purposes • To the patient or pursuant to an authorization • Uses and/or Disclosures required by law • Uses or disclosures that are required for compliance with the HIPAA Privacy Regulations.
Protected Health Information (PHI)	Protected health information is a subset of individually identifiable health information maintained in permanent health records and/or other clinical documentation in either paper-based or electronic format.
Proprietary information	UW Medicine possesses exclusive rights over the information within its systems. This includes business plans, intellectual property, financial information or other sensitive materials and information in printed, electronic or verbal form that may affect employee rights or organization's operations.
RESTRICTED Information	RESTRICTED Information is information that is business data, which is intended strictly for use by designated UW Medicine employees and agents. This classification applies to information less sensitive than CONFIDENTIAL information. Dissemination of this information shall only be made to UW Medicine workforce with an established need-to-know.
Workforce	Faculty, employees, trainees, volunteers, and other persons who perform work for UW Medicine, and whose work conduct is under UW Medicine's direct control regardless of whether or not the workforce member is paid by UW Medicine.
UW Medicine	UW Medicine includes the following entities: Harborview Medical Center and clinics; UW Medical Center and clinics; Northwest Hospital & Medical Center and clinics; Airlift Northwest; Hall Health Primary Care Center; UW Physicians Sports Medicine Clinic; The Association of University Physicians d/b/a University of Washington Physicians; UW Medicine Neighborhood Clinics; Reference Lab; Collagen Diagnostic Lab; Molecular Diagnostic Lab; Summit Cardiology; Sports Medicine Group; Neurosurgical Consultants of Washington; The Seattle Arthritis Clinic; Richmond Internal Medicine; The Bone & Joint Center of Seattle; and Primary Care Partners Northwest, as well as certain services and activities that support UW Medicine that are performed by non-health care components of the University of Washington as defined within Privacy Policy PP-01 Use & Disclosure of Protected Health Information – Organizational Requirements. UW School of Medicine is subject to the UW Medicine Information Security Program..
Use	The sharing, employment, application, utilization, examination, or analysis of information within UW Medicine.