



SUNY Orange Policy Manual

Policy Number	Policy Title
BP3.11	Notice of Privacy Practices

The College is committed to protecting the privacy and security of the health and other personal and confidential information of employees and students. In general, the College will ensure that such personal and confidential information will not be used, disclosed or confirmed to anyone who is not specifically authorized to receive or have access to the information under applicable law or the applicable policies and procedures of the College.

This policy applies to all members of the College workforce, whether directly employed by the College or serving under an alternative arrangement. It shall include, but not be limited to: employees, volunteers, student aides, students participating in a health related program, agency and contracted staff (including temporary staff), consultants, contractors and subcontractors, and faculty and credentialed staff.

Members of the College's workforce who fail to adhere to the College's policies and procedures, or state and federal law regarding the privacy and security of personal and confidential information, will be subject to discipline under applicable law and/or collective bargaining agreement, up to and including termination of employment.

Each member of College's workforce whose job responsibilities require having access to personal and confidential information will be expected to comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and with the Federal Privacy Rule 45C.F.R., Section 164.520. Such employees will also be required to sign the College's "Workforce Confidentiality Agreement." This signed statement will be maintained in the appropriate employee personnel file.

Students in the Health Professions shall sign the "Student Confidentiality Statement," which shall be maintained in the appropriate department chair's student files.

Anyone who knows of, or has reason to believe, that another person has violated this policy, or otherwise impermissibly accessed, used or disclosed personal and confidential information, should report the matter immediately to his or her department supervisor or department chair, or the College's Compliance Officer. The College's Compliance Officer shall investigate all reports received. Failure to report a breach will be considered a violation of this policy.