Name of Policy: **Compliance with privacy and security of protected health information (PHI)** **Policy Number**: 3364-15-07 **Approving Officer**: President **Responsible Agent**: Compliance/Privacy Officer **Scope**: All University of Toledo Campuses	**Effective date**: August 1, 2008

	New policy proposal	X	Minor/technical revision of existing policy
	Major revision of existing policy		Reaffirmation of existing policy

(A) Policy statement

There will be ongoing surveillance of the privacy and security of protected health information (PHI).

(B) Purpose of policy

The purpose of this policy is to assure compliance with The University of Toledo policies relating to the privacy and security of protected health information.

(C) Procedure

(1) The monitoring mechanisms will include, but not be limited to, the following;
- (a) Periodic observation of employees, work areas, patient care areas
- (b) Patient complaints
- (c) Occurrence report data
- (d) Electronic monitoring systems

(2) From information obtained from the various mechanisms, plans for continued education and/or other corrective action, technology improvements or other physical improvements will be developed and implemented.

(3) Effectiveness of these actions will be determined based on improvements in the compliance with The University of Toledo privacy and security policies.

Approved by: /s/ laj Lloyd A. Jacobs, M.D. President July 8, 2008 Date *Review/Revision Completed by:* *Compliance/Privacy Officer*	**Policies Superseded by This Policy:** • *01-086 Compliance with privacy and security of protected health information (former Health Science Campus Policy effective date 9/9/04)* **Initial Effective Date:** August 1, 2008 **Review/Revision Date:** **Next review date:** August 1, 2011