BACKGROUND AND PURPOSE

Occasionally, non-UW health care professionals participate in and provide services to School of Dentistry patients. When this occurs, protected health information is shared between the entities or health care professionals as necessary for treatment, payment, and certain health care operations. The School’s Notice of Privacy Practices communicates this practice with its patients and an additional Agreement (e.g. Business Associates Agreement) is not required. This policy details the steps School of Dentistry takes to ensure that Privacy regulations are met and patient information is protected.

SCOPE

This policy applies to all non-UW health care professionals who participate in and provide services to School of Dentistry patients and are given access to School of Dentistry patient information (e.g. axiUm). This policy specifically applies to, but is not limited to, Seattle Children’s and Children’s University Medical Group employees who participate in the care provided to School of Dentistry patients at the Center for Pediatric Dentistry and to Seattle Cancer Care Alliance employees who participate in the care provided to School of Dentistry patients at the Seattle Cancer Care Alliance.

POLICY

The School of Dentistry notifies its patients via the Notice of Privacy Practices that protected health information may be shared with non-UW health care professionals who participate in and provide services to School of Dentistry patients. The School of Dentistry requires a signed Non-UW School of Dentistry Privacy, Confidentiality and Information Security Agreement for all non-UW health care professionals who have access to School of Dentistry patient information.

PROCEDURE

- The School of Dentistry Department Administrator or designee will fill out a New Help Desk Ticket Form requesting a New Account.

  o Enter the information into the Help Desk form for all required fields (Do not fill in any information in the “Submitted for” field.

  o For the “Category” field select “Account Maintenance” then click on the “Click Here For Account Maintenance” button.
o Under “Appointment Type”, choose “Non-UW”.

o Under the Access Requested part of the form summarize the reason for access in the “IF Non-UW what is the reason for access?” field.

o After submitting the form, the user will receive an email with a link to the Non-UW Privacy Agreement. They will then print the agreement. This Agreement is required for all non-UW providers with access to School of Dentistry patient information. Completed Agreements must be kept on file by the Department.

- The Compliance Department automatically receives a copy of requests for non-UW provider access to School of Dentistry patient records. The Compliance Department will respond to the request email indicating whether or not access is approved within 2 business days.
  
  o The Compliance Director will contact the Department Administrator directly if access cannot be approved based on current information.

- Department Administrators or their designees are responsible for notifying IT immediately upon determining an individual no longer requires, or is no longer permitted, access to School of Dentistry patient information. This notification is necessary so that IT can terminate the individual’s access to patient information as required by law.

Dean of UW SOD:

Jean Garber, Assistant Dean, Finance & Administration
May 16, 2012