



HCOP HIPAA PRIVACY AND SECURITY POLICY

EFFECTIVE DATE:	July 22, 2025 (Revised)
RESPONSIBLE ADMINISTRATOR:	Associate Dean of Clinical Affairs and Outreach
APPLICABILITY:	Faculty, Staff, and Students

I. PURPOSE

In accordance with the [United States Code of Federal Regulations Part 164- Security and Privacy, Subparts A, C, D, and E](#)¹ the purpose of this policy is to establish privacy and security processes to ensure HCOP adherence to the federal “Health Insurance Portability and Accountability Act of 1996” (HIPAA) and related regulations.

II. POLICY

- HCOP is committed to maintaining the privacy and security of protected health information (PHI) by safeguarding individually identifiable information regarding an individual’s health and healthcare provision.
- HCOP will comply with [Auburn University’s HIPAA Privacy and Security Policy](#)² which provides guidance on the administrative, technical, and physical standards that are required to ensure the confidentiality and security of PHI.
- HCOP will ensure that all faculty, staff, and students are aware of HIPAA regulations and know how these regulations pertain to their professional role in all healthcare settings.
- HCOP will protect the privacy and confidentiality of all health information shared with us in our role as healthcare professionals.
- HCOP will develop and maintain policies and procedures (that are compiled in the “HCOP HIPAA Manual”) that provide guidance for how patient privacy and the security of health information will be maintained in all HCOP environments. HCOP will ensure that faculty and staff are aware of this manual and where this information is stored and how it can be accessed.
- HCOP will designate an “HCOP HIPAA Officer” for the school, and the name and contact information of this person will be made available for faculty, staff, and students.

III. PROCEDURES

HCOP faculty, staff, and students will be required to complete HIPAA training **ANNUALLY**.

A. STUDENT PHARMACISTS:

- Student Pharmacists will **ANNUALLY** complete an educational module that is provided by “The Pharmacists Letter”.
- Upon completion of the module, the student will print a certificate of completion and upload this documentation into CORE® for review by Clinical Affairs and Outreach’s Experiential Programs Office (EPO) staff.
- Students who do not upload this documentation by the designated deadline will receive consecutive e-mail notifications / warnings from an EPO staff member.
- These warnings will be sent at designated time intervals after the due date.
- If the student does not submit the required documentation after the second warning, the student will receive a “Professionalism Assessment”.
- This might lead to further action by HCOP’s Committee on Academic Requirements, Professionalism, & Student Success (CARPSS).

B. HCOP EMPLOYEES:

- Employees are required to **ANNUALLY** complete mandatory HIPAA training that is assigned by Auburn University’s Division of Institutional Compliance and Privacy.
 - a. If the employee does not complete this required training by the established deadline, the employee’s supervisor will be automatically notified. Continued failure to complete mandatory training will result in progressive discipline (from written reprimands up to possible dismissal).
 - b. HCOP employees may be required to complete HIPAA training that is required by multiple organizations, administrative departments, or units. These include, but are not limited to:
 - i. Mandatory AU HIPAA training assigned by Auburn University’s Division of Institutional Compliance and Privacy based on the individual’s occupational roles and responsibilities.
 - ii. CITI Training modules that are required for human research / IRB compliance.
 - iii. Mandatory HIPAA training that is required by the employee’s practice site(s).
 - c. Training modules assigned by different organizations, departments, units, or practice sites are not interchangeable. Every module that is required / assigned **MUST** be completed.

C. HCOP HIPAA OFFICER:

The current HCOP HIPAA Officer is:

Dr. Greg Peden

Executive Director of Clinical Health Services

Division of Clinical Affairs and Outreach (CAO)

2155 Walker Building | Auburn University Pharmaceutical Care Center (AUPCC)

Auburn University, AL 36849

pedengc@auburn.edu | (334) 844-4099

IV. POLICY MANAGEMENT

This policy will be reviewed by HCOP's Clinical Services Advisory Committee (CSAC) and the Associate Dean of Clinical Affairs and Outreach (ADCAO) at a minimum of every three (3) years, or more frequently if there is a substantive change to clinical guidelines / best practices; AU Risk Management policies, procedures, or processes; or HCOP policies, procedures, or processes that necessitate earlier review and revision.

V. DEFINITIONS

HIPAA: The Health Insurance Portability and Accountability Act of 1996 as amended by the Health Information Technology for Economic and Clinical Health Act.

PHI: Protected Health Information which is individually identifiable health information that is held or transmitted by a covered entity that relates to an individual's past, present, or future physical or mental health; the provision of healthcare services to an individual; and / or the past, present, or future payment for healthcare services.

VI. EXCLUSIONS

None

VII. SANCTIONS

Failure to comply with this policy may result in CARPSS action for students and suspension and progressive discipline for employees (up to and including possible dismissal).

VIII. EFFECTIVE DATE

- Original October 23, 2019
- Revised August 17, 2023
- Revised July 22, 2025

IX. INTERPRETATION

- A.** Associate Dean of Clinical Affairs and Outreach
- B.** HCOP HIPAA Officer
- C.** Executive Director of Clinical Health Services
- D.** Department Heads
- E.** Executive Director of Experiential Programs

X. REFERENCES / RESOURCES

1. CFR- Title 45, Subtitle A, Subchapter C, Part 164- Security and Privacy. United States Code of Federal Regulations. December 28, 2000. Accessed July 22, 2025. [eCFR :: 45 CFR Part 164 -- Security and Privacy](#).
2. Auburn University HIPAA Privacy and Security Policy. Auburn University Institutional Compliance and Security. September 15, 2023. Accessed July 22, 2025. [HIPAA Privacy and Security Policy - HIPAA Privacy and Security Policy](#).