HIPAA – Health Insurance Portability and Accountability Act

HIPAA requires the University of Chicago to sign Business Associate Agreements with all vendors who do work for the University that involves access to Protected Health Information (PHI).

In order for the University to share PHI with a vendor, a Business Associate agreement must be signed by both parties. To determine if a vendor will have access to Protected Health Information (PHI), review the tables below. If any boxes in section A are checked, the vendor will not have access to PHI and a Business Associate Agreement is not required. If any boxes in section B are checked, the vendor will have access to PHI and a Business Associate Agreement is required prior to entering into any transaction.

A. Is the vendor

☐ Part of the University of Chicago including University of Chicago Physicians Group, University of Chicago Health Plan, University’s Employee Benefits Plans, and the University of Chicago Hospitals (including its employee benefits plans)
☐ Friends Family Health Center, and the RDOs.
☐ Part of the OHCA’s workforce?
☐ Conduit for information – Us Postal Service, Fed Ex, UPS
☐ Financial Services company that processes payment for health care and no health information is used or disclosed to the company
☐ Health care provider involved with treatment of patient (includes reference laboratories)
☐ Distributor of products
☐ Service provider for non-medical equipment or facilities (e.g., plumbers, electricians, photocopy services)

A Business Associate Agreement is not necessary

B. Is the vendor

☐ Coding and billing provider
☐ Waste disposal and recycling company
☐ Medical transcription service
☐ Microfilm, optical disk conversion provider (or any other archiving)
☐ Clearinghouse
☐ Billing company
☐ Insurance broker or insurance company
☐ Records management company (storage and reproduction)
☐ Temporary staffing agency
☐ Software and hardware provider who accesses PHI for installation, maintenance and support services
☐ Implant vendor
☐ Other medical/surgical vendor with representatives on site who perform a function or activity for or on behalf of UCH?
☐ On-site service provider for medical equipment/instrumentation where exposure to PHI would be more than incidental
☐ Lawyers, Accountants, Consultants, Independent Contractors with access to PHI

A Business Associate Agreement is necessary

Not sure whether the vendor will have access to PHI

Purchasing and Payment Services