

Title: Contractor Agreements with Relation to Protected Health Information	No.: IM 4.24
	Effective: 4/2003
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Approved By: Tanya Kuehnast, Director HIM/Privacy Officer	Page 1 of 2

Entity: Health First

I. OBJECTIVE

The intent of this policy is to ensure that all contractors understand Health First’s privacy and security policies, and to prevent inappropriate uses or disclosures of Protected Health Information or other confidential information.

II. DEFINITION

Protected health information (PHI), also individually identifiable information, as used in the Health First Information Privacy policies, is defined as a subset (record or transmission) of health information, including demographic information, collected from an individual. It is created or received by a health care provider (including Health First), health plan, employer, or health care clearinghouse. It relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual. In addition, the information identifies the individual; or can be used to identify the individual.

III. POLICY

- A. Every contractor (temporaries, consultants, registry nurses, practitioners, outsourcing agencies, etc.) contracted by Health First must understand the organization’s policies and procedures regarding security and confidentiality of information (see Information Management policy & procedure, IM 4.20 “Creation of Information Privacy and Security Policies).
- B. Contractors working with PHI must enter into a Business Associate Addendum/Agreement with Health First. Contractors’ employees are subject to the requirements of their firm’s Business Associate Addendum/Agreement.
- C. Specific requirements for the Business Associate Addendum are located in Information Management policy & procedure, IM 4.07 “Business Associate Agreement.”

IV. PROCEDURE

N/A

V. REFERENCES

Health Insurance Portability and Accountability Act of 1996

45 C.F.R. Parts 160 and 164 Standards for Privacy of Individually Identifiable Health Information; Final Rule; August 14, 2002.

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