

October 12, 2006

TO: RAYMOND AUSTIN  
Chair, Student Union Assembly  
PAMELA EDWARDS  
Co-Chair, Staff Advisory Board  
DAVID KLIGER  
Campus Provost and Executive Vice Chancellor  
JEAN MARIE SCOTT  
Acting Vice Chancellor, Student Affairs  
FRED TAKEMIYA  
University Counsel  
THOMAS VANI  
Vice Chancellor, Business and Administrative Services  
BERRA YAZAR  
President, Graduate Student Association

RE: DRAFT HIPAA SECURITY RULE COMPLIANCE POLICY

Dear Colleagues:

As the UC Santa Cruz Health Insurance Portability and Accountability Act (HIPAA) Security Officer, I am forwarding for your review a draft policy for campus HIPAA Security Rule compliance. UC Santa Cruz is subject to the federal HIPAA Security Rule, which identifies legal requirements for the protection of electronic health information for health care providers and related entities. This policy establishes the requirement for all UCSC entities subject to the HIPAA Security Rule (currently Student Health Services, Benefits Office, Fire Department, and ITS) to implement an identified set of practices in order to demonstrate their compliance with the requirements of this legislation.

Two other documents support this policy and are linked below: *Recommended UCSC Practices for HIPAA Security Rule Compliance*, and a *UCSC HIPAA Security Rule Compliance Workbook* documentation tool. We seek input on the policy and these other two documents.

As part of the process to secure campuswide approval of the draft policy and supporting documents, I would like to receive input from the following offices, and any others that you identify as appropriate:

Academic Human Resources  
Academic Senate  
Campus Controller  
Counseling and Psychological Services  
Fire Department

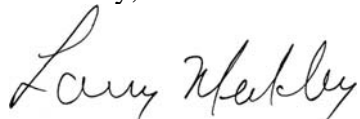
Graduate Student Association  
Internal Audit  
Labor Relations  
Staff Advisory Board  
Staff Human Resources  
Student Health Services  
Student Union Assembly

Please forward the draft policy to the above organization(s) or unit(s) that you represent for appropriate review. Comments can be sent in writing or via email to Julie Goldstein, ITS Service Manager for Community and Compliance, at [itpolicy@ucsc.edu](mailto:itpolicy@ucsc.edu) or Mailstop: ITS-Delaware. It is important to provide comments by Friday, November 3, 2006 in order to inform the approval process.

The UC Santa Cruz HIPAA Compliance Team and IT Security Committee have reviewed these documents and believe that they represent a thorough, consistent approach to campus compliance with Federal HIPAA Security Rule legislation. The comments we hope to receive will be very important to ensure that the policy, practices and workbook meet the needs of the campus and of the current and future units responsible for ensuring HIPAA Security Rule compliance.

If you have any questions or would like a hard copy of any of these materials, please feel free to contact Julie Goldstein at 459-2779, [itpolicy@ucsc.edu](mailto:itpolicy@ucsc.edu).

Sincerely,



Larry Merkley  
Vice Provost, Information Technology

**Enclosures:** Draft Policy – *HIPAA Security Rule Compliance Policy* (attached; also available online at <http://security.ucsc.edu/policies/HIPAAPolicy.pdf>)

Attachment 1 – *Recommended UCSC Practices for HIPAA Security Rule Compliance:*  
<http://security.ucsc.edu/policies/HIPAAPractices.pdf>

Attachment 2 – *UCSC HIPAA Security Rule Compliance Workbook:*  
<http://security.ucsc.edu/policies/HIPAAwkbk.pdf>

**cc:** IT SECURITY COMMITTEE  
UCSC HIPAA COMPLIANCE TEAM  
ITS SENIOR MANAGEMENT TEAM  
ITS DIVISIONAL LIAISONS  
VICE PROVOST AND DEAN, UNDERGRADUATE EDUCATION  
VICE PROVOST AND DEAN, GRADUATE STUDIES DIVISION