The federal government recently passed a national rule regarding the privacy of health information that impacts the Medical College of Wisconsin’s ability to use this information to carry out its mission and conduct its day-to-day activities. This national rule is called the Privacy Regulation and is part of the Health Insurance Portability and Accountability Act (HIPAA).

The Privacy Regulation defines a Business Associate as any individual or organization that performs, or assists in the performance on behalf of MCW a function or activity involving the use or disclosure of individually identifiable health information. Business Associates are also individuals or organizations that provide certain specific services involving the disclosure of individually identifiable health information from MCW. Examples of services that may make an individual or an organization a business associate include consulting, data aggregation and transcription services.

To comply with this regulation, MCW has adopted a policy that prohibits the disclosure of protected health information (PHI) to any outside person or entity with which we do not have a signed Business Associate Addendum. The list of vendors with whom we have a signed Business Associate Addendum can be found on the MCW HIPAA website. If a person or entity is identified as a Business Associate and is not identified on the list of vendors with signed addendums, then to meet our obligation under the Privacy Rule, an addendum must be signed prior to the disclosure of PHI. The Business Associate Addendum can be found at the same website.

If you wish to access these references and learn more about HIPAA please visit the MCW HIPAA website at http://infoscope.mcw.edu/display/router.asp?DocID=7961.