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**University of Wisconsin-Madison  
Policy and Procedure**

Policy Number: 10.2  
Policy Title: Designation of Unit Privacy and Security Coordinators  
Effective Date: April 1, 2003  
Last Revision Date: September 3, 2014  
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**I. Policy**

UW-Madison ensures the successful implementation of UW-Madison of its policies and procedures created to comply with the privacy and security regulations (“the Privacy Rule” and “the Security Rule,” respectively) of the Health Insurance Portability and Accountability Act (“HIPAA”), by requiring affected units within the UW-Madison Health Care Component to designate unit Privacy and Security Coordinators to oversee policy implementation by such units.

**II. Definitions**

- A. UW-Madison Health Care Component (“UW HCC”): Those units of the University of Wisconsin-Madison that have been designated by the University as part of its health care component under HIPAA. See Privacy Policy # 1.1 “Designation of UW-Madison Health Care Component” for a listing of these units.
- B. UW-Madison HIPAA Privacy Officer: The individual appointed by the University of Wisconsin-Madison to be the Privacy Officer as required by the HIPAA Privacy Rule.
- C. Unit: A health care provider unit of the UW-Madison campus that has been designated as part of the UW-Madison Health Care Component.

**III. Procedures**

- A. Privacy Coordinator. The Dean or Director of each unit within the UW HCC must designate a person or person(s) to act as the unit’s Privacy Coordinator. The Privacy Officer functions as the Privacy Coordinator for those units comprised of personnel that perform business support functions on behalf of the units that provide health care. The Privacy Coordinator shall be responsible for the following:
  - 1. Ensuring that his/her unit has developed policies and procedures as required by campus policies to ensure compliance with the Privacy Rule;

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2. Acting as the first point of contact for faculty, staff, and students within the unit regarding issues related to privacy and Privacy Rule compliance;
  3. Acting as an initial point of contact for patient complaints that arise from activities within the unit;
  4. Acting as the unit's liaison with the UW-Madison Privacy Officer regarding issues related to privacy and Privacy Rule compliance;
  5. Ensuring that each employee within the unit has taken the appropriate level of privacy training by the applicable deadline.
  6. Performing other functions as designated in the UW-Madison policies implementing the Privacy Rule; and
  7. Making reports to the UW-Madison Privacy Officer, as requested, on items #1-5, above.
- B. Security Coordinator. The Dean or Director of each unit within the UW HCC that creates or maintains PHI in electronic form must designate a person or person(s) to act as the unit's Security Coordinator. The Security Officer functions as the Security Coordinator for those units comprised of personnel that perform business support functions on behalf of the units that provide health care. The Security Coordinator shall be responsible for the following:
1. Ensuring that his/her unit has developed policies and procedures as required by campus policies to ensure compliance with: (a) the security/technical safeguards provisions of the Privacy Rule; and (b) the Security Rule;
  2. Acting as the first point of contact for faculty, staff, and students within the unit regarding issues related to security and Security Rule compliance;

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3. Acting as the unit's liaison with a UW-Madison Security Officer regarding issues related to security and Security Rule compliance; and
4. Ensuring that each employee within the unit has taken the appropriate level of security training by the applicable deadline.
5. Making reports to the UW-Madison Security Officer, as requested, on items #1-4, above.

C. Designation of Coordinators.

1. The Dean or Director of each unit shall designate the unit's Privacy and Security Coordinators, and shall notify the UW-Madison Privacy Officer and the Security Officer of these designations promptly upon any change.
2. A unit may designate the same person to act as more than one of its Coordinators.

**IV. Documentation Requirements**

None.

**V. Forms**

None.

**VI. References**

45 CFR 164.504(c)(3) (HIPAA Privacy Rule)

**VII. Related Policies**

- Policy Number 9.1 "HIPAA Privacy and Security Training"
- Policy Number 10.1 "Complaints Under the HIPAA Privacy Rule"

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**VII. For Further Information**

For further information concerning this policy, please contact the UW-Madison HIPAA Privacy Officer or the appropriate unit HIPAA Privacy Coordinator or sub-Coordinator. Contact information is available within the “Contact Us” tab at [hipaa.wisc.edu](http://hipaa.wisc.edu).

**Reviewed By**

Chancellor  
Chancellor’s Task Force on HIPAA Privacy  
UW-Madison HIPAA Privacy Officer  
UW-Madison Office of Legal Affairs

**Approved By**

Interim HIPAA Privacy and Security Operations Committee