



MIDDLE TENNESSEE STATE UNIVERSITY
Healthcare and HIPAA Compliance Subcommittee
Meeting Minutes – April 11, 2018
2pm – 3pm

Members Present:

R. Chapman; Dr. T. Ragland; A. Magnuson; C. Mullis; M. Barton; A. Schmuhl; K. Thurman; C. Davis; Dr. T. Odegard; Dr. M.K. Anderson; G. Stephens

Members Absent:

M. Nokes; S. Wade

Guests:

Dr. Jennifer Cooper

Note Taker:

G. Stephens

Minutes

1. **Prior Meeting Minute Approval.** After introductions and welcoming of new Committee members from the Center for Dyslexic Studies, the ACE Learning Center, and Counseling Services (hereinafter referred to as “the Centers, meeting minutes from the November 15, 2017 meeting were reviewed and approved (two, minor edits were later submitted after the April 11, 2018 meeting from a Committee member). Ms. Stephens additionally provided background on her reasoning for inviting the Centers to the Committee, since most, or all of the Centers are covered under FERPA rather than HIPAA.
2. **Annual HIPAA Training for Health Services and Campus Pharmacy Staff.** Ms. Stephens asked Dr. Ragland and Director Chapman about tracking of annual staff training on HIPAA. Dr. Ragland commented that HIPAA training is provided to all staff annually, including student workers. Ms. Magnuson keeps track of the training attendance, and Director Nokes maintains copies of the PowerPoint. Ms. Stephens then discussed the use University’s use of SafeColleges – a vendor that will begin to provide MTSU’s annual, mandatory Title IX and Title VI training and will additionally provide Ethics training. Ms. Stephens commented that as part of the suite of offerings by

SafeColleges, MTSU can utilize up to five (5) training modules of which HIPAA Privacy and Security is one. Ms. Stephens commented that the HIPAA training presented by SafeColleges included information on the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH), as well as provided short questions after each topic covered in the module. Dr. Ragland and Director Chapman agreed to try a demo of the SafeColleges HIPAA training to determine if it could be of additional value to the departments' existing, annual training. Ms. Stephens agreed to follow-up with the vendor to allow Dr. Ragland, Director Chapman, Director Nokes, and Ms. Magnuson access to the SafeColleges HIPAA training demo.

3. **Accellion Implementation Training.** Mr. Mullis and members of the Information Technology Division (“ITD”) provided an update on the Accellion software implementation. The pilot for the software was temporarily delayed due to a technical glitch, but testing will now resume this summer. ITD is currently working on completing the demo of the software to perform a pilot and presentation to Health Services and Campus Pharmacy. Mr. Barton discussed some of the features of Accellion, and Ms. Stephens mentioned the additional compliance and auditing features of the software. Ms. Stephens asked if the Centers present would like to be a part of the Accellion demo. Ms. Davis, Dr. Odegard, and Dr. Anderson agreed to participate in the demo and felt it would be helpful to secure the privacy of their student data. Ms. Stephens and ITD will provide follow-up on a date for the presentation and demo of Accellion to the Committee.
4. **HIPAA Policy Review.** Ms. Stephens discussed MTSU Policy 85 (“Policy”) – Health Insurance Portability and Accountability Act, and provided an overview and background of the purpose and scope of the Policy. In an effort to expand both the HIPAA Privacy and Security provisions of the Policy, Ms. Stephens asked Committee members to make any recommended changes or edits to the Policy and return the edits to her by July 30, 2018. Edits of the Policy will be reviewed at the next, full meeting in the final quarter of 2018.
5. **Additional Items.**
 - a. Accellion Software, HIPAA vs. FERPA, and Other Center Participation. Ms. Davis commented that her Center’s records include some healthcare data but mostly include other records that would be regulated under FERPA. Ms. Davis additionally inquired whether the Accellion software would be appropriate for her records. Mr. Mullis commented that we would need to review examples to see how much of the ACE Learning Center’s records fell under HIPAA, as the Accellion software is HIPAA certified. Ms. Stephens explained that Accellion still could be utilized for greater records security and privacy for all of the Centers and could be used for compliance auditing and tracking of records transfers since the software allows users to provide a deadline date for the retrieval of

electronically transmitted documents. Ms. Davis additionally suggested that the Early Learning Program should be invited to the Accellion demo.

Dr. Odegard informed the Committee that like the ACE Learning Center, the Center for Dyslexic Studies also had very little HIPAA covered information but did have student records. Ms. Stephens explained that most of the Centers present fell under the FERPA regulations; however, where the Centers transmit any medical information electronically to a HIPAA covered entity, HIPAA is triggered. Ms. Stephens suggested that the use of the Accellion software, therefore, could be useful for all of the Centers. Dr. Odegard recommended that other Centers might also want to attend the Committee. Dr. Anderson also recommended that the Committee include the Center for Counseling and Psychological Services. Ms. Stephens agreed to reach out to the additional, named Centers for participation in the Committee.

- b. Dr. Ragland informed the Committee the HIPAA Privacy Practices was downloaded on all Campus Pharmacy signature pads; however, customers were only asked to sign the signature pads once, and the Pharmacy system was recording the signature annually. Ms. Stephens stated that customers needed to sign the signature pad for acknowledgement of the Campus Pharmacy's privacy practices for each prescription picked up. Dr. Ragland agreed to amend the system so that customer signatures are captured for each prescription pick-up. Dr. Ragland also asked Ms. Stephens to visit the Pharmacy after the meeting to review their posting and location of the Privacy Practices. Ms. Stephens agreed to visit the Pharmacy after the meeting.
- c. Ms. Magnuson and Director Chapman commented that the Health Services Kiosks have not yet been updated to capture only MTSU M-numbers rather than student social security numbers; however, Ms. Magnuson is working on this issue.
- d. Dr. Anderson inquired about mandatory FERPA testing and mentioned that her staff are required to complete certain CEUs as part of their annual licensure requirements. Ms. Stephens commented that FERPA training is facilitated by the Office of University Counsel ("OUC"). While FERPA training is available to all staff, it is not mandated. Mr. Mullis commented that as part of the annual, mandated, data security training, a module on FERPA is included. Ms. Stephens agreed to work with the OUC to determine options for a mandatory FERPA training seminar for all the Centers that could be provided on an annual basis.

6. **Adjourn.** The meeting adjourned at 2:57pm.