



## POLICY

Title:	Confidentiality of University Records and Information
Effective Date:	Reviewed December 1, 2019
Approved By:	President's Council
Responsible Party:	Compliance Officer
History:	8/7/15
Related Documents: University Compliance Plan; HIPAA Policy; FERPA Student Records Policy; Student Judicial Policy; Cardholder Data Information Security Policy;	

### I. PURPOSE

Salus University is committed to maintaining the integrity and security of confidential records and information created, received, maintained and/or stored by the University in the course of carrying out its educational, patient care, and research missions. This policy addresses the obligations to secure confidential information from unauthorized or unlawful disclosure. It is intended to reflect federal and state law governing privacy and confidentiality of records, as well as University policies and procedures addressing specific categories of records and information.

### II. DEFINITIONS

**University Records** means any documents, data, or other recorded information created or received by Salus University employees, independent contractors, or students in the course of university business. These records can exist in any form. Records include paper and electronic documents (including e-mail), audio and video recordings, databases, and emails. Some examples of records include, but are not limited to, contracts, minutes, correspondence, memoranda, financial records, published materials, photographs, digital or sound recordings, video recordings, drawings, maps, and computer data.

**Confidential Records** include without limitation any personally-identifiable employee, student or parent records, financial records (including social security and credit card numbers), health records of students and employees; clinical and financial records of patients; contracts, research data; alumni donor data and donor records; personnel records other than an individual's own personnel record; university financial data; computer passwords, university proprietary information and data; and any other information for which access, use or disclosure is not authorized by: 1) federal, state, or local law; or 2) university policy.

### III. POLICY

- All members of the University community are required to maintain the confidentiality of business and nonpublic University records and data entrusted to them, except when disclosure is authorized by an appropriate officer of the University or required by law.
- University data and information may only be used for University purposes.
- In accordance with federal and state law and university policy, confidential records should never be disclosed without appropriate authorization, and should be maintained and secured according to the following principles:
  - A. Documents and files (both electronic and hard copy) containing confidential information are to be accessed, used, and disclosed only with explicit authorization and only on a need-to-know basis for the purpose of a job function, contract, volunteer or paid service to the University.
  - B. Confidential information regarding any individual or entity acquired during the course of employment at, or providing services to, the University must never be divulged to anyone outside of the University without authorization or to anyone within the university except on a need-to-know basis.
  - C. Records must be maintained and disposed of according to University policy on record retention and disposition, records retention schedule, and accompanying procedures.
  - D. Records may only be received, maintained, accessed or transmitted on University resources in accordance with the requirements and safeguards of the appropriate use and other applicable policies, regardless of form, medium, or device.
  - E. Upon conclusion of employment of service, or upon request of a supervisor, all originals and copies of confidential records, whether electronic or hardcopy, must be returned to the University and all further access to and use of such information relinquished.
  - F. If in doubt about whether a record is confidential, the user should treat as confidential any University record which is not already within the public domain, until directed otherwise.
  - G. The University takes no responsibility for the unauthorized collection, storage or transmittal of third party information regarding any individual or entity by students, faculty, staff, volunteers, or vendors as defined, that if owned by Salus University would be subject to this policy.
- Violations of this policy will be treated seriously. Employees' failure to comply with this policy may lead to discipline, up to and including termination. Student workers employed by the University who violated this policy may be terminated from their jobs and may also face discipline in accordance with the Student Judicial Policy. Others covered by this policy may lose the opportunity to contract with, volunteer for, or otherwise provide service to the University. Violations might also subject the violator to criminal or civil prosecution under federal or state laws.