

SPELMAN COLLEGE PRIVACY RULE: MITIGATION AFTER IMPROPER PROTECTED HEALTH INFORMATION (PHI) USE OR DISCLOSURE

Spelman College, in an effort to comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) maintains that employee benefits information must be kept private and confidential.

Spelman College has a duty to ensure the proper use and/or disclosure of PHI. To the extent practical, Spelman College will mitigate (i.e. lessen or alleviate) any harmful effect that becomes known to Spelman College and its business associates in violation of Spelman College's policies and procedures or applicable law.

Mitigation may include, but is not limited to, the following:

- Taking operational and procedural corrective measures to remedy violations
- Taking employment actions to re-train, reprimand or discipline employees as necessary, up to and including termination.
- Addressing problems with business associates once Spelman College becomes aware of a breach of privacy.

Individuals who violate this policy will be subject to disciplinary actions up to termination of employment.