H.1.A.iii

HIPAA Security Regulations

Title: Sanction Policy

Security Rule: 164.308(a)(1)

Purpose: To ensure that all members of the Emory workforce abide by and comply with all Emory HIPAA Security Regulations policies and procedures.

Requirements: Emory will observe the following in addressing noncompliance with HIPAA Security Regulations policies and procedures:

1. All incidents of noncompliance with HIPAA Security Regulations policies and procedures shall be promptly investigated and any security violations mitigated in a timely manner.

2. Workforce members shall be appropriately sanctioned and/or disciplined for noncompliance with or violations of the HIPAA Security Regulations policies and procedures.

3. Sanctions and/or discipline imposed against workforce members who fail to comply with HIPAA Security Regulations policies and procedures shall be commensurate with the severity of the violation.

4. Sanctions and/or discipline for violations of HIPAA Security Regulations policies and procedures may include, but are not limited to, re-training, verbal and written warnings, loss of access to research data and/or termination of employment.

5. Emory managers and/or supervisors shall not intimidate or retaliate in any way against any workforce member or other individual who reports a lack of compliance or violation of Emory’s HIPAA Security Regulations policies and procedures.

This policy and its procedures must be reviewed and evaluated on a periodic basis to ensure that they maintain their technical viability and effectiveness.

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment and/or criminal prosecution.

Recommended By: Emory HIPAA Security Working Group

Effective Date: April 20, 2005

Authorized By: Emory HIPAA Security Steering Committee

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