

## URI HIPAA PRIVACY POLICY # 36

<b>Title:</b>	<b>REFRAINING FROM INTIMIDATING OR RETALIATORY ACTS</b>	<b>Purpose &amp; Background</b>	<b>See Memo Entitled "HIPAA at URI: Introduction to HIPAA and an Overview of HIPAA Implementation at URI" available online at the URI HIPAA website</b>
<b>Originator (Responsible Department/ Unit):</b>	<b>URI HIPAA Compliance Oversight Committee</b>	<b>Effective Date:</b>	<b>05/22/2018</b>
<b>Applies to:</b>	<b>All URI Departments and Units Designated as HIPAA "Covered Components" and "Business Associate Components"</b>	<b>Revised Date(s):</b>	

### POLICY:

A Covered Component may not intimidate, threaten, coerce, discriminate against, or take other retaliatory action against:

- A. Any individual for the exercise by the individual of any right under, or for participation by the individual in any process established under HIPAA, including the filing of a complaint.
- B. Any individual or other person:
  - i. Filing a complaint with the Secretary of DHHS;
  - ii. Testifying, assisting, or participating in an investigation, compliance review, proceeding or hearing; or
  - iii. Opposing any act or practice made unlawful by HIPAA, provided the individual or person has a good faith belief that the practice opposed is unlawful, and the manner of the opposition is reasonable and does not involve disclosure of PHI in violation of the Privacy Rule.