Tulane University Policy on Fundraising Activities

SCOPE OF POLICY

This policy applies to Tulane University Medical Group, its participating physicians and clinicians, and all University employees and business units who provide management, administrative, financial, legal, and operational support to or on behalf of Tulane University Medical Group and have been designated as part of the Tulane University HIPAA Health Care Component.

STATEMENT OF POLICY

Tulane University Medical Group may not use or disclose protected health information for fundraising without an authorization that meets the applicable requirements under HIPAA except as defined below. The Vice President for Development, School of Medicine must authorize all fundraising activities in accordance with this policy.

IMPLEMENTATION OF POLICY

This policy is based on principles related to the uses and disclosures of protected health information for fundraising.

1. The Tulane University Health Care Component may use, or disclose to a business associate or to an institutionally related foundation, the following protected health information for the purpose of raising funds for its own benefit, without an authorization:
   a. Demographic information relating to an individual, consisting of names, addresses, other contact information, age, gender, and date of birth;
   b. Health insurance status;
   c. Department where treatment was provided;
   d. Treating physician;
   e. Outcome information, for purposes of excluding individuals from a fundraising communication; and
   f. Dates of health care provided to an individual.

2. The Tulane University Health Care Component must provide a recipient of a fundraising communication with a clear and conspicuous description of how the individual may opt out of receiving any further fundraising communications. The opt out method may not impose an undue burden or more than a nominal cost on the individual.

3. The Tulane University Health Care Component must treat individual opt-out requests as a revocation of authorization, pursuant to policy GC-010, Authorization for Release of Protected Health Information and Revocation of Authorization.

4. The Tulane University Health Care Component may provide a method for opting in to fundraising communications that is not targeted towards specific individuals that have opted out of future fundraising communications from Tulane.

5. The Tulane University Health Care Component may not condition treatment on receipt of fundraising communications.
6. The Business Associates and/or Vice President for Development, School of Medicine, Tulane University shall maintain a list of all patients who have opted out and provide a copy of said list annually to the Privacy Official of the General Counsel’s Office.

7. The use of Protected Health Information (PHI) for fundraising purposes other than as described herein is prohibited without a patient authorization that meets the requirements of policy GC-003.