POLICY:

All Fundraising activities at Columbia University Medical Center (CUMC) will be in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), including the Final Omnibus Rule of 2013.

PURPOSE:

The purpose of this policy is to provide guidance to CUMC workforce members on the use of patient information for fundraising purposes. This policy also outlines the proper procedures to follow when a patient opts out of receiving fundraising communications.

PROCEDURE:

- All patients are provided the Notice of Privacy Practices (NPP) at registration. It informs patients that CUMC may use their information to contact them about fundraising activities at Columbia.

- Patients have the right to opt out of receiving fundraising communications. CUMC may not send fundraising communications to or otherwise contact individuals who have opted out of receiving such communications.
  
  o Centers, departments, divisions, institutes, programs, and / or physicians must consult with the Office of Development before sending any correspondence to patients to verify that they have not previously communicated their right to be removed from lists related to fundraising activities.
  
  o Communications by phone for a fundraising purpose must clearly inform the individual that they have the right to opt out of receiving future communications.
  
  o CUMC may not condition an individual’s treatment or payment on whether or not they have opted out of receiving fundraising communications.

- The following patient information may be used for fundraising purposes:
  
  o Demographic information, including name, address, date of birth, age and gender
  
  o Health insurance status
  
  o Department of service
  
  o Date of service
  
  o Treating physician
  
  o Treatment outcome (favorable outcome, suboptimal outcome, or deceased)
FUNDRAISING OPT OUT PROCEDURE

- The Office of Development maintains a list of individuals who have requested to be removed from future fundraising communications.

- Before contacting patients for fundraising purposes, the center/ department/ division/ institute/ program/ or physician must contact the Office of Development to verify that the individuals they wish to contact have not opted out.

- Any CUMC workforce member advised by a patient of his/her request to opt out of receiving future fundraising communications must contact the Office of Development to document the request.

- Written materials mailed to patients for the purpose of soliciting a donation must include the following required opt out language:

  If you wish to be removed from future CUMC fundraising communications, please contact the Privacy Office by telephone (212) 305-7315 or e-mail (HIPAA@columbia.edu)

- Verbal communications / telephone solicitations must also advise patients of the right

- Questions about this policy should be directed to the Office of Development or HIPAA Compliance

RESPONSIBILITY: HIPAA Compliance, Office of Development and Clinical Departments

POLICY ISSUED: December 2003
REVISED: October 2007
REVISED: February 2010
REVISED: September 2013