

FA025 Privacy and Security Policy

Policy Type: Administrative/Operations
Responsible Administrator: David Sakala,
Director, Continuing Medical Education, Office of
Faculty Affairs
Responsible Office: Faculty Affairs

Originally Issued: June 17, 2024
Revision Date: N/A
Training Required: No
LCME Required: No

Approved by:



Marc J. Kahn, MD, Dean

Date: June 17, 2024

Definitions

Ineligible Companies: Companies that are ineligible to be accredited in the Accreditation Council for Continuing Medical Education (“ACCME”) System (ineligible companies) are those whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

Statement of Purpose

The purpose of this policy is to ensure the privacy and security of all data and information collected, managed, and stored by the Kirk Kerkorian School of Medicine at UNLV (“SOM”) and that collection, management, and storage of personal information meets the requirements of the ACCME and the University of Nevada, Las Vegas (“UNLV”).

Entities Affected by This Policy

All SOM individuals affected are required to understand and comply with this policy. A record of this policy will be kept accessible to all individuals affected and made available upon request.

Required Acknowledgement

All entities affected are required to acknowledge they have read and understand this policy.

Policy

Privacy and Security

The SOM is committed to ensuring that personal information collected, managed, and stored for accredited education purposes is maintained in a safe and secure information technology environment that meets best practices for information technology security standards, and complies with federal and state regulations. The SOM follows all policies of UNLV for privacy and security including the Computer Security Policy, Mandatory Cybersecurity Training Policy, and Password Policy.

Personal Information Collected

The SOM uses secure, third-party electronic platforms to manage and store data and information. Personal information collected is used solely for accredited continuing medical education. The following information describes how the SOM collects and uses personal information.

a. Registration and Account Setup and Access

Personal information is collected to generate user accounts that provide direct user access to a secure, third-party platform, including name, professional designation, affiliation, location, and email address.

b. Financial Disclosure

Personal information related to financial relationships for individuals involved in accredited continuing medical education is collected for purposes of regulatory compliance.

c. Accredited Educational Activities

Personal information is collected to verify participation, manage registration, and maintain attendance record for learners in accredited continuing education activities including name, professional designation, affiliation, location, and email address.

d. Assessment/Evaluation/Survey

Individual data and information collected from assessments, evaluation, and/or surveys related to accredited continuing education is managed and retained to assess and/or measure learning outcomes and to inform and/or improve ongoing and future accredited continuing education activities.

e. Reports

Personal information collected including attendance records, professional designation, affiliation, and location is used to produce internal reports. Information used to generate reports is aggregated and removes identifiers of individuals.

f. Electronic Communication

Personal information including name, professional designation, and email address is collected for those who opt-in to receive electronic communications from the SOM.

Other Uses of Personal Information

The SOM may share information related to the qualifications, relevant financial relationships, and affiliations of individuals involved in accredited continuing education to learners and the public.

The SOM may not share the names or contact information of learners participating in accredited continuing education with any ineligible company or its agents without the explicit consent of the individual learner.

The SOM may not share the personal information of users registered to its electronic learning management system with other institutions, except as may be required by law.

Health Insurance Portability and Accountability Act (“HIPAA”)

The SOM, when required to disclose information or release materials as may be required, may not include any individually identifiable health information, in accordance with HIPAA.

Related Documents

[HIPAA Compliance Attestation | ACCME](#)

[Computer Security Policy | University of Nevada, Las Vegas \(unlv.edu\)](#)

[Mandatory Cybersecurity Training Policy | University of Nevada, Las Vegas \(unlv.edu\)](#)

[Password Policy | University of Nevada, Las Vegas \(unlv.edu\)](#)

[AMA PRA Credit System requirements | American Medical Association \(ama-assn.org\)](#)

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