## **HIPAA READINESS CHECKLIST**

For \_\_\_\_\_ Office

Checklist last updated \_\_\_\_\_

#	Requirement	Y	Ν	Update Notes
1.	<ul> <li>Learn about HIPAA with special attention to:</li> <li>Privacy</li> <li>Security (awaiting final regs.)</li> <li>Transactions and codes</li> </ul>			
2.	Become familiar with HIPAA terms. (Glossary at http://www.state.oh.us/hipaa/glossary.htm)	Y	N	Update Notes
3.	<ul> <li>Establish process/policies/procedures to address Privacy:</li> <li>Appoint a privacy officer or assign privacy officer duties to a specific staff member.</li> <li>Develop a notice of privacy, including acknowledgement form.</li> <li>Define who can access and who cannot access protected health information (PHI).</li> <li>Institute a policy allowing patients to access their medical records <ul> <li>Establish a procedure to allow patients to amend their medical records</li> <li>Create a procedure to document all non-authorized disclosures outside of treatment, payment, and health care operations (TPO).</li> </ul> </li> <li>Develop audit trails to provide patients with a listing of all who accessed or received information from their records.</li> <li>Establish a protocol that states release of only the minimum information necessary, where applicable.</li> <li>Review information security including passwords and access to information.</li> <li>Revise your authorization form to include the specific HIPAA language.</li> <li>Identify your business associates.</li> <li>Adopt a business associate agreement</li> </ul>	Y		Update Notes

	<ul> <li>form <i>(see sample link)</i>.</li> <li>New contracts must have a business associate agreement at the time of signing</li> <li>Existing contracts must have a business associate agreement when the contract is amended OR</li> <li>By April 14, 2004 if no renewals, or changes have occurred to the contract since 10/12/02</li> <li>Establish a complaint policy</li> </ul>			
4.	<ul> <li>Training</li> <li>Determine information that needs to be communicated to staff, including all revised policies, procedures, and forms.</li> <li>Develop an in-service program for your staff.</li> <li>Advise each staff member how to report any breaches in the privacy of health information in your practice.</li> <li>Advise all staff of penalties for breaching confidentiality under HIPAA.</li> </ul>	Y	N	Update Notes
5.	<ul> <li>Resources</li> <li>Appoint a staff member to keep abreast of new information or interpretations of provisions and communicate to you.</li> <li>Take advantage of Web sites with HIPAA information (see links).</li> </ul>	Y	N	Update Notes
6.	<ul> <li>Deadlines</li> <li>Privacy, except business associate agreement, by April 14, 2003.</li> <li>Codes and Transactions by October 2003.</li> <li>Business associate agreement due date based on contract status (see #3 above).</li> <li>Security — final regs. communicated.</li> </ul>	Update Notes		