

HIPAA Self-Assessment Tool

Find out how well you are in compliance with the updated HIPAA regulations...

Yes	No	General Administration:
☐	☐	Have your HIPAA Policies and Procedures been updated with the requirements of the HIPAA Final Rule, which took effect 9/23/13?
☐	☐	Do you know where your Notice of Privacy Practices (NPP) is located?
☐	☐	Does your staff know where to find your HIPAA Policies and Procedures?
☐	☐	Do you know who the <u>current</u> Privacy Officer is for the practice?
☐	☐	Do you have documentation for each member of your workforce's training on HIPAA?
☐	☐	Are workforce members re-trained when there is a change to a privacy policy or procedure affecting how they do their work?
Yes	No	Notice of Privacy Practices (NPP):
☐	☐	Does your NPP include the fact that <u>patients have the right to be notified of a breach of their unsecured PHI?</u>
☐	☐	Is the practice handing out its <u>updated</u> NPP to each patient on his/her next visit to the office -- and to new patients on their first visit?
☐	☐	Is the updated NPP posted in a clear and prominent place in your waiting room?
☐	☐	Is the updated NPP available to patients on your website in an easy-to-find place?
☐	☐	Are patients being asked to acknowledge a copy of the NPP was made available?
☐	☐	Is this acknowledgment form being kept for 6 years after the date it was signed?
☐	☐	Does the staff know what to do if a patient refuses to sign the acknowledgement?
Yes	No	Patient Rights:
☐	☐	Does your staff know the HIPAA requirement regarding what can and cannot be charged when providing copies of medical records to patients?
☐	☐	Does your Practice know what to do if a patient asks to <u>amend</u> his/her record?
☐	☐	Do you keep a log of <u>disclosures</u> of a patient's record in accordance with HIPAA requirements?

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| ☐ | ☐ | Can patients request Confidential Communication, such as "Only call my cell phone," or "Call my office, but don't leave a message"? |
| ☐ | ☐ | Do you have a procedure for tracking when you agree to reasonable Confidential Communication requests to ensure they are operationalized within your Practice? |
| ☐ | ☐ | Does your staff know what to do if patients request that you not disclose their PHI to their insurance company? |
| ☐ | ☐ | Do you have a procedure for collecting payment from the patient and ensuring that the insurance is not billed for the requested restricted item or service? |
| ☐ | ☐ | Do you have a process and documented procedure in place for notifying a patient of a breach of his/her protected health information (PHI)? |

Yes No Sale of PHI & Marketing Restrictions:

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| ☐ | ☐ | Do you have written approval from each patient before including his/her name and contact information in any marketing efforts? |
| ☐ | ☐ | Do you know what marketing is and what it isn't under HIPAA? |
| ☐ | ☐ | Do you know that you cannot sell your mailing list, or any other patient PHI, without a written valid HIPAA authorization signed by each patient? |

Yes No Business Associates (BA):

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| ☐ | ☐ | Have you updated your BA Agreement to reflect HIPAA's Final Rule requirements? |
| ☐ | ☐ | Do you have a signed BA Agreement in place with all contractors and associates who create, receive, maintain or transmit your practice's PHI to do their job? |
| ☐ | ☐ | Are your BAs aware that they are required to enter into BA Agreements with any of their downstream subcontractors that create, receive, maintain or transmit PHI on behalf of the BA? |
| ☐ | ☐ | Are you using an updated BA Agreement with all your BAs, including those contractors and associates who weren't previously considered a BA, but are now included as BAs under the Final HIPAA Rule? <ul style="list-style-type: none"> • a Health Information Exchange Organization, • e-prescribing Gateways • vendors of personal health records, • document storage companies (electronic or paper), such as cloud service providers |