

The “Must Do” Steps for HIPAA Compliance

Note – this information was developed by the North Carolina Healthcare Information and Communications Alliance. Thanks to NCPA for sharing this information with WVPA.

- *Designate a Privacy Official* - You must designate an individual to be responsible for the development and implementation of the HIPAA compliance policies and procedures
- *Develop a Notice of Privacy Practices* – This Notice is a public statement that documents your privacy policies and procedures. (There is a sample in APA the product)
- *Develop an Authorization form* – Authorizations are required for all disclosures of Protected Health Information (PHI) for purposes other than what HIPAA defines as treatment, payment and health care operations (There is a sample in the APA product)
- *Develop a Business Associate Contract* – identify all business partners for whom a new contract may be needed. Business associates to whom you may disclose PHI must agree to respect the HIPAA privacy rules regarding PHI. (There is a sample contract in the APA product)
- *Develop policies and procedures to handle patient requests for PHI* – A provider must permit individuals to request, and must accommodate reasonable requests to inspect, copy, and amend their PHI, with some exceptions. (There is a sample in the APA product)
- *Develop policies regarding “minimum necessary” uses and disclosures of PHI* – disclosure must be limited to the minimum necessary to carry out the intended purpose of the request.
- *Develop a training program* – A practice must train its employees about its own compliance policies and procedures. (The APA product provides an information base for training)
- *Deal appropriately with privacy infractions* – You must have and apply appropriate sanctions against employees who fail to comply with privacy policies and procedures.
- *Develop appropriate security safeguards* – to protect the privacy of PHI from any intentional or accidental use or disclosure or violation of Privacy Rule requirements.
- *Keep records of HIPAA compliance* – document your privacy practices (Sample accounting for disclosures form in APA product)