

**Y N GENERAL**

- The Practice Executive has been appointed. This individual oversees the entire application of the HIPAA regulations and assigns responsibilities of team members.
- The HIPAA Coordinator has been appointed. This individual answers to the Practice Executive and oversees the efforts of other team members.
- The Transaction Compliance Officer has been appointed. This person serves as the primary expert on all areas of electronic data transaction and reports to the HIPAA Coordinator.
- The Privacy Officer has been appointed. This individual serves as the primary expert on all privacy matters and reports to the HIPAA Coordinator.
- The Security Officer has been appointed. This person serves as the primary expert on all security matters and reports to the HIPAA Coordinator.
- A Gap Assessment/Risk Analysis has been conducted to identify all areas of compliance or non-compliance.
- A written training program has been developed for the annual training of all employees.
- Training logs/contracts have been developed to document that training has occurred.

**PRIVACY**

- Privacy training has been provided for all new employees.
- Privacy training is provided annually for all employees.
- Privacy training has been documented.
- A written Privacy Plan exists and is reviewed/updated annually
- A Notice Of Privacy Policy is offered to all patients.
- A written Notice of Privacy Policy is posted where all patients may view it.
- All patients have signed a Consent Form acknowledging they have been offered a copy of the Notice of Privacy Policy.
- "Reasonable Accommodations" for privacy have been made for discussions of treatment or payment with patients.
- Business Associate Agreements have been signed by all business associates as defined by HIPAA law.
- Business Associates and their subcontractors (should they utilize them) are aware of their "downstream" responsibility.
- Written Authorizations have been obtained from patients for the use of Protected Health Information (PHI) when used for other than Treatment, Payment or running of Operations.
- Written Authorizations are obtained from patients if they wish for their PHI to be discussed with family members or responsible parties.
- The Employee Manual includes a Confidentiality Agreement/Statement.
- A policy exists for Breach Notification of the patient, should a breach of their PHI occur.

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## SECURITY

- Security training has been provided for all new employees.
- Security training is provided annually for all employees.
- Security training has been documented.
- A written Security Plan exists and is reviewed/updated annually.
- A Security Risk Assessment has been performed, a Gap Assessment completed, and security risks addressed.
- A HIPAA compliant software system is in use.
- Copy and fax machines settings are adjusted to not store data on their internal hard drives.
- Off-site, encrypted backups are performed regularly.
- Password protection is used on all computers that access Protected Health Information (PHI).
- Password "testing" is conducted periodically.
- Business class HIPAA compliant firewalls are installed and functioning properly.
- User Access Controls (UAC) have been turned on and are operating correctly.
- The network is scanned for ports that should be blocked.
- If a wireless system is used, it is business class and encrypted.
- Server data is encrypted.
- The email system is secure and encrypted.
- The operating system software is tested annually.
- Anti-virus, anti-spam and anti-malware protection software is installed and updated regularly
- Virus scans are performed on a regular basis.