

Sample Health System - HIPAA Privacy Issues Log – Version # 1

Grp./No.	Issues to be addressed	Functional Team	Est. Comp Dt	Resolution/Progress	Status
BA1	Define and document what is a Business Associate?	E			Open
BA2	Compile list of Business Associates to be used when updating contracts	Region Rep.			Open
BA3	Complete Business Associate contract	E			In Progress
CERT1	Who will perform certification on a regular basis?	K			Open
CONS1	Review/Revise Consent forms	E, A			Open
COVER1	Define “covered entities” and identify all separate entities within the CCHS system. <ul style="list-style-type: none"> Hospitals Separate provider facilities (surg centers, etc) Insurance Plans Scope of Subcategories: <ul style="list-style-type: none"> - Affiliated covered entities -Organized health care arrangements -Hybrid entities 	ALL (Tenet)		Current organizational chart	Open

LEGEND

AUTH	Authorization	DISC	Disclosure	INCID	Incident Reporting	PHYS	Physicians
BA	Business Associate	EMR	Electronic Medical Record	LEGAL	Legal/contract issues	PRIV	Patient Privacy
CERT	Certification	FUND	Fundraising	MKT	Marketing	STATE	State Law
CONS	Consent	HIS	Health Information Systems	NOTICE	Private Notice	TRAIN	Education & Training

Sample Health System - HIPAA Privacy Issues Log – Version # 1

Grp./No.	Issues to be addressed	Functional Team	Est. Comp Dt	Resolution/Progress	Status
DISC1	Define “disclosure” What does this include? Medical records, reports, downloads, online access, etc?	ALL			Open
DISC2	Disclosure logging: Electronically track all external requests for patient information	E			
EMR1	Electronic medical record issues	I			Open
FUND1	Do we need to review the info being shared with Fundraising departments? Are they getting any info not allowed by regs?	H			Open
HIS1	Will the med record need to be secured differently than when sent to another location (RMP, atty, ins company)	A, E			Open
HIS2	List protected Health Information (PHI) by category	ALL			Open
INCID1	Where is appropriate place for Incident Reporting to be managed (does non-disclosure apply here?)	E, F, L			Open
INCID2	Sanctions: how do we handle incidents of non-compliance for privacy internally?	Privacy Officer HR			Open
LEGAL	Scope of “public interest” clause in privacy regs? Who can use it? <ul style="list-style-type: none"> • Employees • Health-care researchers (including Rx companies that fund the research) • Governments: fed, state, local • Law enforcement personnel 	E			
MKT1	How will we handle the function that needs to be included in marketing materials	G			Open
NOTICE1	Create Notice of Privacy Practices for all to use	ALL			Open
OTHER1	What items will CCHS define and share vs. allowing hospital entities to create their own specific items.				Open

LEGEND

AUTH	Authorization	DISC	Disclosure	INCID	Incident Reporting	PHYS	Physicians
BA	Business Associate	EMR	Electronic Medical Record	LEGAL	Legal/contract issues	PRIV	Patient Privacy
CERT	Certification	FUND	Fundraising	MKT	Marketing	STATE	State Law
CONS	Consent	HIS	Health Information Systems	NOTICE	Private Notice	TRAIN	Education & Training

Sample Health System - HIPAA Privacy
Issues Log – Version # 1

Grp./No.	Issues to be addressed	Functional Team	Est. Comp Dt	Resolution/Progress	Status
PHYS1	What guidance do we provide for physicians? All regional hospital physicians are not employees.	RMP			Open
PHYS2	Do the regs limit MD to MD communication, if so, to what extent?	M, E			Open
PHYS3	Need to get regional medical practice representation on the privacy group.	M			Open
PRIV1	How will we track the level of privacy pt agree to? Example: pt does not give auth for use for marketing or revokes this.	A, G, I, J			Open
PRIV2	How will pt notify us of the limited use of their information (check off list)?	A			Open
PRIV3	Will a pt be able to state that they do not want their presence at CCF known at all (grease boards in units, ED, info desk, etc)	A, C, I		1/25/00 CCHS western region has drafted a privacy policy which allows different levels of privacy, but no alias. (L. Schneider)	Open
STATE1	Identify any regulations conflicting with state laws	E, M			Open
TRAIN1	Should there be a defined minimum amount of education required for employees, business associates, etc? If so, who should set those?	ALL			Open

LEGEND

AUTH	Authorization	DISC	Disclosure	INCID	Incident Reporting	PHYS	Physicians
BA	Business Associate	EMR	Electronic Medical Record	LEGAL	Legal/contract issues	PRIV	Patient Privacy
CERT	Certification	FUND	Fundraising	MKT	Marketing	STATE	State Law
CONS	Consent	HIS	Health Information Systems	NOTICE	Private Notice	TRAIN	Education & Training