

HIPAA Checklist
Activities to Making Health Information more Secure

Here is a basic checklist to get you started on activities you need to do to become compliant with the HIPAA Privacy Rule. Keep in mind that the deadline is April 14, 2003. Start from date as your target finish date and work backwards to establish your timeline.

Task	Start Date	Finish Date	Complete
GETTING STARTED			
Decide whether you are covered			<input type="checkbox"/>
Appoint a responsible person or group and give them appropriate authority to act			<input type="checkbox"/>
Decide where and how to store documentation			<input type="checkbox"/>
Develop an activity list and timeline, (you can use this checklist to start)			<input type="checkbox"/>
Plan for Ongoing Activity (Process, Structure, etc)			<input type="checkbox"/>
Learn what HIPAA requires and do a gap analysis to assess where your current practices may be lacking.			<input type="checkbox"/>
COMPLIANCE ACTIVITIES			
Identify and document where health information is and where it goes. Define the designated record set.			<input type="checkbox"/>
Appoint a privacy official and a contact person for complaints (could be the same person/title).			<input type="checkbox"/>
Document privacy policies and procedures.			<input type="checkbox"/>
o Privacy Policies, review, safeguards, etc.			<input type="checkbox"/>
o Permissible, Required, and Prohibited Use and Disclosure			<input type="checkbox"/>
o Marketing, Fundraising, Research			<input type="checkbox"/>
o Minimum Necessary			<input type="checkbox"/>
o De-identified and/or Limited data set			<input type="checkbox"/>
o Verification Procedures (when disclosing to someone unknown)			<input type="checkbox"/>
Document policies and procedures for Individual rights			<input type="checkbox"/>
o Receive and Acknowledge Notice of Privacy Practice			<input type="checkbox"/>
o Inspect, Copy, Amend designated record set			<input type="checkbox"/>
o Ask for Further Restrictions on disclosures or confidential communications			<input type="checkbox"/>
o Ask for an accounting			<input type="checkbox"/>
o File Complaints			<input type="checkbox"/>
o Refrain from requesting waiver or retaliation			<input type="checkbox"/>
Develop Forms			<input type="checkbox"/>
o Acknowledgement			<input type="checkbox"/>
o Notice of privacy practices			<input type="checkbox"/>
o Authorization			<input type="checkbox"/>
o Misc. Forms (complaints, access requests, amendment, etc.)			<input type="checkbox"/>

Task	Start Date	Finish Date	Complete
Train employees in privacy. Document all training efforts.			<input type="checkbox"/>
Develop or ensure current employee discipline process addresses privacy violations.			<input type="checkbox"/>
Develop employee separation/termination policy and procedure or checklist. (e.g. change passwords, return keys, revoke access privileges, etc.)			<input type="checkbox"/>
Decide which relationships need Business Associate (BA) Agreement or Data Use Agreement. Draft contract language.			<input type="checkbox"/>
Implement appropriate administrative (e.g. policies, procedures, training), technical (e.g. passwords), and physical (e.g. locks) safeguards in place to make sure health information is private and secure. (See quick tips).			<input type="checkbox"/>
ONGOING MAINTENANCE			
Verify Identity and authority when needed			<input type="checkbox"/>
Distribution, signature, and documentation/storage of forms			<input type="checkbox"/>
Ongoing Maintenance of Policy, Procedure, Forms, to ensure it reflects changes in law and organizational changes (inc. policy for regular review and process).			<input type="checkbox"/>
Document and Respond to patient request, questions, or comments (individual rights)			<input type="checkbox"/>
Track disclosures that need to be accounted for			<input type="checkbox"/>
Monitor/Audit for compliance and follow up and mitigate consequences of breach			<input type="checkbox"/>
Keep documentation for at least six years			<input type="checkbox"/>
Review system upgrades, office and physical changes, organizational changes for HIPAA implications.			<input type="checkbox"/>

About Fox Systems, Inc. Fox is a nationally recognized leader in health care consulting and expert in the HIPAA regulations. FOX Systems, Inc. is a privately held national health care management consulting company founded in 1987. It is a women and minority-owned firm that provides client-focused strategic systems planning, systems design, business process improvement, and HIPAA compliance solution services to the public and private health care industry. FOX maintains its corporate headquarters in Scottsdale, Arizona and maintains project offices in Sacramento, California; Anchorage, Alaska; Santa Fe, New Mexico; and Baltimore, Maryland. For Consulting or Copyright distribution information, contact Fox at 480.423.8184 or visit our website at www.foxsys.com.

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