

Checklist for HIPAA Privacy

If you have determined you are required to comply with the privacy regulations under HIPAA, here is a checklist to help you with compliance.

- Appoint a HIPAA privacy officer.
- Develop "minimum necessary" policies for:
 - Uses
 - Routine disclosures
 - Non-routine disclosures
 - Limit request to minimum necessary
 - Ability to rely on request for minimum necessary
- Develop policies for access to designated record set:
 - Providing access
 - Denying access
- Develop policies for accounting of disclosures.
- Develop policies for amendment requests:
 - Accepting an amendment
 - Denying an amendment
 - Actions on notice of an amendment
 - Documentation
- Develop policies for business associate (BA) relationships and amend business associate contracts or agreements:
 - Obtain satisfactory assurances in contract
 - Document sanctions for non-compliance
- Develop verification policies.
- Develop policies for alternative means of communication request.
- Develop policies for restricted use request.
- Develop complaint policies.
- Develop anti-retaliation policies.
- Develop appropriate administrative, technical and physical safeguards.

- Train workforce:
 - Train staff
 - Develop sanctions for non-compliance.
- Develop and disseminate privacy notice.
- Limit disclosures to those that are authorized by the client, or that are required or allowed by the privacy regulations.

This checklist is to be used only to assist facilities in HIPAA awareness. It is the responsibility of each facility to assess and comply with HIPAA as is appropriate.

The Alabama Medicaid Agency and EDS (Electronic Data Systems) are not responsible for providers becoming HIPAA compliant.