

September 9 , 2013

Compliance^{Pro} Solutions

Managing Healthcare
Privacy and Security
Compliance



NEWSLETTER

Remember to Vote September 3 - 23 Attention Active AHIMA Members

Our own William "Kelly" McLendon, RHIA, CHPS, is running for the office of President/Chair Elect of the AHIMA, and the polls are now open. Though typically there has not been a high voter turnout for the AHIMA elections, we would love to see an increase in the number of voting members this election cycle. The ballot is very strong across all offices, so please vote using the following link anytime through September 23: <http://ivote.ahima.org>



Welcome New PrivacyProTM Customers

Managing Privacy & Security Compliance from Physician Offices to Large Hospital Networks



Carolinan HealthCare System

One of the nation's largest and most comprehensive healthcare systems, comprising academic medical centers, hospitals, physician practices, surgical and rehabilitation centers, home health, nursing homes and



**SOUTHEAST GEORGIA
HEALTH SYSTEM**

Southeast Georgia Health System is a multi-facility healthcare system headquartered in Brunswick, Georgia and serving residents in six counties in

hospice care, Carolinas Healthcare System has 7460 licensed beds and 791 care locations. Carolinas is just beginning their PrivacyPro™ implementation and plans to use PrivacyPro™ for tracking wrongful disclosures, amendment/restriction requests and possibly other applications.



CMIT Solutions is a leading provider of managed services and other computer consulting services tailored to small business with over 135 local offices. Serving many healthcare customers, they rely on PrivacyPro™'s risk assessment tools to evaluate their own internal operations as well as perform assessments for their physician office and clinic customers.



Primary Partners is an Accountable Care Organization located in the Orlando area that supports approximately 65 physician offices. They will be leveraging PrivacyPro's risk assessment tools and other components in the PrivacyPro™ Reference Library to assess their internal operations and those of their physician offices.

Southeast Georgia. SGHS is in production with PrivacyPro™, using it to track wrongful disclosures and amendment requests.



Powersolution.com is an award winning Northern New Jersey and Central North Carolina computer support and managed IT services provider. Serving many healthcare organizations, they utilize PrivacyPro™ security and privacy risk assessments and associated policies and procedures located within our Reference Library to ensure they are properly managing their customer's PHI.

Look for CompliancePro Solutions™ at AHIMA

Visit us in the Exhibit Hall

CompliancePro Solutions™ will be attending the 2013 AHIMA conference in Atlanta from October 26-30 and will be available in the exhibit hall. Please [contact us](#) for further details, to arrange a demo, or set up a date and time to meet.

Attend the Privacy and Security Institute

CompliancePro Solutions™ is proud to be the Premier Sponsor of the [2013 Privacy and Security Institute](#) held October 26-27. Participants will learn from a line-up of experts investigating critical privacy and security topics such as mobile device management and breaches. Join us for this advanced-level meeting to expand your knowledge and stay abreast of the "hottest" privacy and security trends today, and earn up to 13 CE units.

Objectives:

- Advance skills to lead the workforce through the dynamic healthcare transition
- Understand key points for evolving privacy and security programs in a continually changing industry
- Learn effective management approaches to the industry's "hot" privacy and security issues

- Gain practical insights for alternative privacy and security operational methods



New PrivacyPro™ Features and Updates

PrivacyPro™ is our comprehensive, secure, web-based solution providing HIPAA compliance programs, which serve physician offices to large scale hospital networks. PrivacyPro can help manage privacy and security events, handle HIPAA requests, provide privacy and security risk assessments and contains a comprehensive reference library.

The following new features and updates have recently been implemented in PrivacyPro:

Security Incident Tracking Feature

This new application is directed at IT security teams for tracking and managing security incidents. Leveraging PrivacyPro's standard features, there is a Security Incident Details form, a configurable Action Items form for working security incidents, an Attachments tab for attaching all related documentation, and an Activity Log tab for tracking all activity on this incident. A standard Security Incident details report is provided. Security Incident Tracking uses the same database of "responsible persons" that is used by Wrongful Disclosures, allowing you to track individuals who have been responsible for both Privacy and Security incidents.

Risk Analysis Supporting Omnibus

An updated Risk Analysis, based on the recent Omnibus ruling, will be available in early September. Under Admin, you can configure the date for which the new Risk Analysis form goes into effect. Wrongful Disclosures with a Discovery Data after this date will use the new Risk Analysis form. Like the current Risk Analysis form, PrivacyPro will ask the user a series of questions about the incident based on a detailed analysis of the Omnibus Guidelines. Then PrivacyPro will make a recommendation as to whether this disclosure is likely a Breach or not. As before, the user makes the final determination and documents their rationale.

PrivacyPro™ Library Updates for Omnibus

If you are a new Reference Library User, a new document, "Welcome To The PrivacyPro™ Reference Library," has just been added to the first folder in the library to help get you started.

It has been a busy few months finalizing all of the Library updates for Omnibus. As always, PrivacyPro™ customers can search the Reference Library for updated documents, and there are many of them lately. Each document has some notation in the commentary as to whether the update was substantive as opposed to just polish and simple editing. [Click here for a checklist that shows which policies need to be updated for Omnibus by your site.](#)

As far as CompliancePro Solutions™ our policy templates have all been updated in the Library, typically in the "Physician Practice Privacy Policy Templates," "Physician Practice Privacy Form Templates" and "Privacy Compliance Template" folders. Of note, we have new breach materials, the NPP is current and the BAA specimen are all updated, along with many privacy policies that had material impacts from the Omnibus rules. There were few security policies impacted, therefore few of them have been updated.

Note: The Physician Practice Privacy and Form Template folders are both a bit more updated than the "Privacy Compliance Templates" folder. We work to keep them in synch but typically update the 'Physician Practice' folders first. These folders are not strictly for physician offices, as hospitals will find them useful and maybe easier to navigate. There are a few instances of documents that are not ever used at physician practices that are more hospital based in the "Privacy Compliance Templates" folder, but not many. If anyone has questions about all these folders and the updated policies, please contact Kelly McLendon at kmclendon@complianceprosolutions.com or give him a call at 321-268-0320.

PrivacyPro™ Usage Tips

Helpful Hints for PrivacyPro Customers

Home Page List of Events Getting Long? Use Filters

By now, many sites have accumulated a large number of events, particularly disclosures. To avoid having this long list display every time, take advantage of the table filters that appear at the bottom of each home page tab. You can set your filters based on date range, covered entity, status, and assigned user. Note that PrivacyPro remembers your filter settings across login sessions.

A common filter is to set the date range filter to only view events for the last 6 months and the status filter to only view "Not Closed" events, which displays Active and New events. Furthermore, if your responsibilities are for a single CE or if you only want to see events assigned to yourself, use the other appropriate filters.

Categorize Your Disclosures

If you want to group your disclosures into different categories for reporting purposes, use the recently added "Category" field which appears on the Wrongful Disclosures Details form. This is a site configurable pick list whose values can be set on the Wrongful Disclosures page under Admin. The Disclosure Summary Report displays the number of disclosures in each category.

Test Environment

To clearly segregate test data from production data, we suggest the following:

1. Create a "Test" region on the Covered Entities & Regions page under Admin
2. On the same Admin page, create a single "Test CE" covered entity.
3. On the Admin / Users page, allow users to access test data by granting them permission to the newly created "Test" region.
4. Now, when creating test events for any application, assign them to the "Test CE" covered entity.
5. Any time you want to see test data only, simply set your home page filter to the "Test CE".

The above procedure will keep your test data clearly separated from your real data for reporting and analysis purposes and can easily be identified and deleted if no longer needed.

Training Classes Available

HIPAA Privacy and Security Courses and Resources

Through our education partner, Libman Education, a leading provider of training for the healthcare workforce, we now offer online, self-paced classes that provide basic information about HIPAA privacy and security required for any party that interacts with patient's personally identifiable, protected health information. [Learn More or Sign Up Today](#)

To help prepare you for the HIPAA Omnibus Rule deadline on September 23, 2013, we are also offering

a [free HIPAA readiness whitepaper](#). Understand the impact this deadline will have on your organization and learn about the 10 important tasks that you need to address.

CompliancePro
Solutions™



*Managing Healthcare Privacy
& Security Compliance*

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