



HIPAA Privacy

April 23-24, 2018

Agenda

- Preliminary Findings from Annual Risk Assessment
- OCR On-Site Visit
- Training and Education
- Physical Security
- BLC Enrollment





HIPAA Privacy and Security Risk Assessment 2018

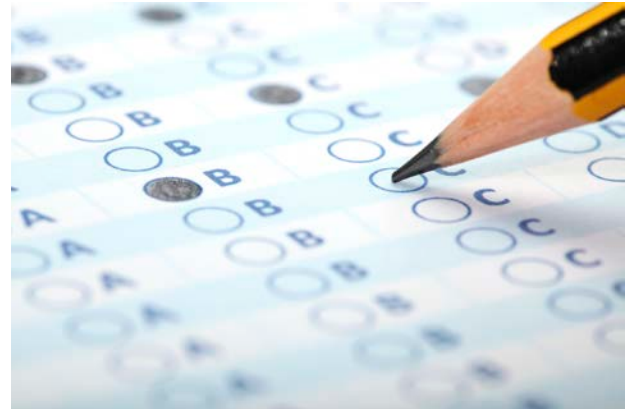


- Banner Corporate
- Banner Health Network
- UA Health Plan
- Community Hospital
- Academic Division
- Ambulatory



Preliminary Findings

- Notice of Privacy Practices – Registration Sites
- Notice of Privacy Practices – Inconsistent
- Active Directory – Opt Out Process
- Self-Pay Policy
- Security Screens
- Physical Security
- Amendment Process
- Training and Awareness





OCR On-Site Visit

- Opening Conference
- Thunderbird Medical Center
- Interviews with Privacy and Security
- Conclusion



- Introduction
 - Vanessa Gonzalez
 - Amy Raines
- Available Education

Release of Information Training Provided by HIMS

RELEASE OF INFORMATION Training is held from 9-1PM

05/08/2018

09/11/2018

06/12/2018

10/09/2018

07/10/2018

11/13/2018

08/14/2018

12/11/2018

IMPORTANT INFORMATION

Anytime you hire new staff or just need a refresher please sign up for our classes above. You can register them or they can self register through the Banner Learning Center. All classes listed will be scheduled for Arizona times. Below is a link to the tip sheet on how to register. Employees only need to register if they are not supported by CROI.

[How to register for class in BLC](#)

If you have any questions and/or are needing assistance please reach out to BHHIMSOPSEducation@bannerhealth.com



Training and Education

- Ideas from Attendees
- Area Compliance Program Directors
- Practice Managers and Supervisors
- Other Leaders
- Meetings (Leadership/Staff/Others)
- Email
- e-News





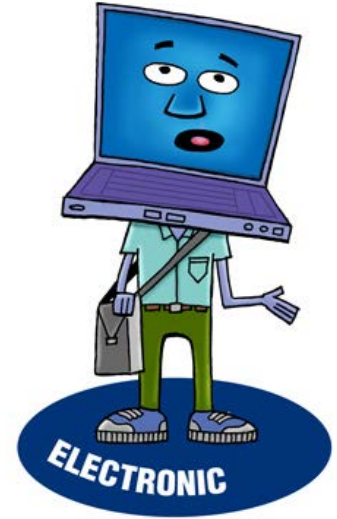
Physical Security of PHI



- Paper PHI
 - Baskets/bins/mailboxes with medical records, patient labels, etc. should not be easily viewable or accessible
 - PHI secure when no one is around (i.e. locking up at night when clinic closes)
 - Transporting PHI (use of approved courier; should not be transporting without prior approval)
 - Shred bins (shred vs. recycle); emptying personal shred bins into locked bins at the end of shift or at the end of the day
 - Thank you cards; Culinary food slips; pt labels on food/drinks in visitor/patient fridge
 - Copy machine, fax printers placed in secure/non-public areas

Physical Security of PHI

- Electronic PHI
 - Locking/suspending computer or Cerner when walking away
 - Do not share passwords/credentials or have them easily accessible or viewable by others
 - Positioning of computers; privacy screens
 - Unapproved cloud servers; forwarding of emails with PHI; texting PHI
- Other
 - Whiteboards (minimum necessary PHI)
 - Door keypad codes changed routinely



Banner Learning Center (BLC)

Timely completion of BLCs is the responsibility of each employee in order to remain in compliance with Banner Health's Safety & Regulatory Requirement.

- The deadline for completion of BLCs for 2018 is **June 30, 2018**
- Leaders have up-to-date access to completion information in the BLC system
- Failure to complete all BLC courses is considered a **performance issue**



Q&A Time

