

PRIVACY

UPDATED 06/19/02

Task	Headquarters	Who	Status/ Comp. Date	Area	Who	Status/ Comp. Date	Facility	Who	Status/ Comp. Date
Determine what needs to be done to comply with HIPAA Privacy Standards.	Compare Privacy Act to HIPAA privacy standards and determine what needs to be done to comply with HIPAA.	Privacy Off Health Records.	Completed – IHS HIPAA Website						
Make needed changes to Privacy Policy.	Rewrite Privacy Policy so that it is HIPAA compliant.	Privacy Off	Completed – Legal Review	Rewrite Area Office Privacy Policy so that it is HIPAA compliant.			Rewrite facility Privacy Policy so that it is HIPAA compliant.		
Develop procedures for updated Privacy Policy.	Rewrite privacy procedures so that they follow the new policy.	Privacy Off	Completed – Draft stage/Legal Review	Rewrite Area Office privacy procedures so that they follow the new policy.			Rewrite facility privacy procedures so that they follow the new policy.		
Revise forms affected by the updated Privacy Policy.	Update forms so they are HIPAA compliant: Consent Form Authorization Form Correction/Amendment for PHI Notice of Privacy Practices <u>See expanded list for all forms.</u>	Privacy Off. Health Records	Completed* Completed* Completed* Pending- *Under Legal Review	Update forms so they are HIPAA compliant: Consent Form Authorization Form Correction/Amendment for PHI Notice of Privacy Practices			Update forms so they are HIPAA compliant: Consent Form Authorization Form Correction/Amendment for PHI Notice of Privacy Practices.		
Update contracts to be HIPAA compliant.	Develop Business Associate Contracts (BAC) for HIPAA compliance.	Contracts Office		Develop Business Associate Contracts for HIPAA compliance.			Develop Business Associate Contracts for HIPAA compliance.		
Identify contracts that need a BAC clause	Place BAC in all contracts that require it.	All Offices							
Update privacy training materials	Develop new Privacy Training materials that are HIPAA compliant.	HIPAA Team	Under development	Develop new privacy training materials that are HIPAA compliant.					
Train staff in new privacy procedures	Use newly developed training materials to train staff on privacy standard, policies and procedures.	HIPAA Team		Use newly developed training materials to train staff on privacy standards.			Use newly developed training materials to train staff on privacy standards.		