

HIPAA Privacy Rule Compliance Checklist for Healthcare Providers

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Implementing administrative requirements:

1. Designate a privacy officer.
2. Develop privacy policies and procedures.
3. Provide training to all employees with access to protected health information.
4. Develop and distribute a privacy notice and acknowledgment form.
5. Display privacy notice in prominent location at physical site of service delivery.
6. Post privacy notice on website (if website falls within requirements of Rule).
7. Prepare or amend Business Associate contracts.
8. Create consent and authorization forms.

Drafting policies and procedures:

A covered entity's policies and procedures should be specific to the operations of the covered entity and appropriate to the size and scope of the covered entity's activities. In general, a covered entity's policies and procedures should include:

- A. Rules for uses and disclosures of [Protected Health Information] PHI including minimum necessity requirements, including:
 - The identity of the classes of employees who need access to PHI to perform job duties;
 - The categories and types of PHI needed; and
 - The conditions upon which such access is allowed.
- B. Rules for safeguarding protected health information
- C. Procedures for verifying the identity of persons seeking disclosure of protected health information
- D. Rules for disclosing PHI to family and friends of patients
- E. A detailed complaint procedure
- F. Rules regarding the appropriate application of sanctions for workforce violations
- G. Procedures regarding the training requirements

- H. Procedures and time requirements for implementing individual rights and responding to requests for information, including:
- Right to copies
 - Right to amend records
 - Right to an accounting
 - Right to request restrictions
 - Right to file a complaint
- I. Procedures for obtaining consents and authorizations
- J. Procedures for distribution of the privacy notice and obtaining acknowledgments
- K. Rules for implementing business associate agreements and responding to business associate violations
- L. Procedures for retention of records and documentation requirements