COMPLIANCE ACTION CHECKLIST

PRACTICE NAME: _____

COMPLIANCE ISSUE IDENTIFIED TO ADDRESS	DATE OF ACTION	ACTION TAKEN	RESPONSIBLE PARTY	COMMENTS/information/training Provided/who provided to/outcomes
OIG COMPLIANCE PLAN for **Individual and Small Group Physician Practices** **Federal Register / Vol. 65, No. 194 / Thursday, October 5, 2000** **&** **Patient Protection and Affordable Care Act (PPACA), P.L. No. 111-148 (March 23, 2010)**				
• ABN • Accounts Receivable • Advertising, unlawful • Appeals (be careful of double billing) • Assignment of Benefits • Audits, Billing – internal/external • Billing Compliance • Cash Control and Embezzlement prevention • Charity Care/Financial Hardship • Claims Submission – clean claims/claims submission audit • CMS 1500 • Coding o Upcoding o Unbundling o E&M using 1995/1997 guidelines • Code of Conduct • Coding Books/Charge Slips/Encounter forms • Collection at time of service • Collections regulations • Collections • Collection Agencies • Compliance Plan, OIG • Copays, deductibles and coinsurance • Corrective Action Initiatives • Credit Card on file				

COMPLIANCE ACTION CHECKLIST

PRACTICE NAME: _____

• Compliance Office Designation • Communication, open lines of • Disciplinary standards, action and enforcement • Discounting Care • Documentation and audits of • Education/Training of staff • Fee schedules • Financial Arrangements/Payment Plans (Truth in Lending Act) • Financial Controls, internal • Incident to, mid-level providers • Improper Inducements, Kickbacks and Self-Referral • Monitoring • NSF/Returned Checks • Overpayments and Refunds • Physician Relationships with Hospitals o The Physician Role in EMTALA o Teaching Physicians o Gainsharing Arrangements and Civil Monetary Penalties for Hospital Payments to Physicians to Reduce or Limit Services to Beneficiaries o Physician Incentive Arrangements • Professional Courtesy • Provider identifiers, control use and misuse of • Reasonable and Necessary Services o Local Medical Review Policy o Advance Beneficiary Notices o Physician Liability for Certifications in the Provision of Medical Equipment and Supplies and Home				

PRACTICE NAME: _____

Health Services o Billing for Non-covered Services as if Covered • Record Keeping • Rental of Office Space in Physician Offices by persons or entities to which physicians refer • Responding to detected offenses • Sanction Screening • Signature on file, Medicare • Third-Party Billing Services • Write offs				
HIPAA AND HITECH				
• HIPAA PRIVACY • HIPAA SECURITY • HIPAA AND HITECH • HIPAA 5010 (see attached indices for action plan)				
ARRA/PPACA/HITECH E.H.R./ E-Prescribing etc.				
OSHA COMPLIANCE (Federal & State)				
• General Duty Clause (OSH Act of 1970 Sec. 5) • Hazard Communication Standard 29 CFR 1910.1200 • Bloodborne Pathogens Standard 29 CFR				

PRACTICE NAME: _____

1910.1030 • Ionizing Radiation Standard 29 CFR 1910.1096 • Exit Routes Standards 29 CFR 1910.34, 29 CFR 1910.35, 29 CFR 1910.36, 29 CFR 1910.37 • Electrical Standards 29 CFR 1910 Subpart S • Emergency Action Plan 29 CFR 1910.38 • Fire Safety Standard29 CFR 1910.39 • Medical and First Aid Standard 29 CFR 1910.151 • Personal Protective Equipment (PPE) 29 CFR 1910 Subpart I • Record Keeping 29 CFR 1904; 29 CFR 1904.8; 29 CFR 1910.1030(h)(5); 29 CFR 1904.39 • OSHA Poster and Posting Requirements • Other Hazards: o Ergonomic hazards o Workplace violence o Slips, Trips, and Falls o Influenza o Tuberculosis o Emergency response hazards o Chemical hazards (for example) ▪ Ethylene Oxide ▪ Formaldehyde ▪ Glutaraldehyde ▪ Hazardous Drugs ▪ Waste Anesthetic Gases o Compressed Gas o Laser Hazards				

PRACTICE NAME: _____

o Latex Allergies				
EMPLOYEE/PERSONNEL (Federal & State)				
• **ABC test** o Independent Contractors / Contract Labor • **Absenteeism**-Attendance and Leave Policies • **Accrued leave**-Vacation and Sick Leave • **Acknowledgment of receipt**-Acknowledgement Of Receipt Of Employee Handbook • **ADEA**- Early Retirement - Voluntary Leave Incentives - Age Discrimination Issues • **Administrative fees**-Deductions for Administrative Fees • **Affirmative action** - Affirmative Action/Equal Employment Opportunity Policies and Job Postings and Recruitment • **Age discrimination**-Early Retirement - Voluntary Leave Incentives - Age Discrimination Issues • **Agility tests**-Pre-Employment Tests and Examinations • **AIDS** • **Alcohol testing**-Drug and Alcohol Policies • **Alimony - wage garnishment** o Accrued Leave Payouts o Allowable Deductions Under the FLSA o Deductions for Administrative Fees o Employees Without Social Security Numbers o Final Pay o Minimizing the Risk of Wage Claims				

o Severance Pay o Texas Payday Law Deduction Summary o Work Separations - General • **Alternative staffing**- Alternatives to Hiring Employees Directly • **Annual salary**-Annual Salary Paid in Shorter Period • **Appeals** - Quick Do's And Don't's In UI Claims And Appeals • **Applications**-Job Applications • **Assault and battery**-Workplace Investigations - Basic Issues for Employers • **Attendance**-Attendance and Leave Policy • **Attitude - poor attitude**- Unemployment Insurance Law - The Claim and Appeal Process • **Audits** • **Authorization for deductions**-Deduction Problems under the Payday Law • **Automated timekeeping systems**-Use of Automated Timekeeping Systems • **Background checks and reference checks** • **Bad-weather days**-Pay and Attendance Issues and Salary Test for Exempt Employees • **Bankruptcy – garnishment** • **Base Period** • **Battery** • **Beards**- Dress Codes and Grooming Standards • **Benefits** • **Bereavement Leave** • **Best candidate**- Deciding on the Best Candidate for the Job • **Body ornamentation**- Dress Codes and Grooming Standards • **Bona fide occupational qualification (BFOQ)**- Deciding on the Best Candidate for the Job • **Bonuses**				

PRACTICE NAME: _____

• **Breach of contract** • Breaks • Breast-feeding / breast-pumping • **Calculating overtime pay** • **Cash wages** • **Cell phone use** • **Checklist – termination** • **Check stubs** • **Chargebacks** • **Child Labor** • **Child support** • **Co-employment** • **COBRA** • **Commissions** • **Company-issued credit cards** • **Compensation** • **Compensatory time** • **Complaints** and Grievances • **Compliance – FLSA** • **Computer policies**-Computer, E-Mail, and Internet Policy, Monitoring Company Computers And The Internet • **Computer professionals** • **Concealment** • **Conduct** • **Confidentiality** • **Confidentiality of medical information** • **Conflict of interest** • **Constructive Discharge** • **Consultants** • **Contract labor**- Independent Contractors / Contract Labor • **Conventions - time off for political conventions**, Voting - Time Off • **Court-ordered garnishment**				

PRACTICE NAME: _____

• **Credit cards** • **Criminal history** • **Cultural issues**-Cultural Differences In Workplace Investigations • **Deductions from pay** • **Defamation** • **Deferred pay** • **Direct deposit** • **Disciplinary investigation** • **Disciplinary pay cuts** • **Discipline** • **Discrimination** • **DOT drug-testing rules** • **Dress Codes** • **Drivers** • **Drug-free workplace policy** • **Drug and alcohol policies** • **Drug testing** • **Drug testing consent form** • **Duty of loyalty**- Conflict of Interest • **E-mail policies** • **Early retirement** • **Earnings statement** • **Education, continuing/conferences etc** • **EEO policies** • **Electronic fund transfer of wages** • **Emotional distress** • **Employee leasing** • **Employment at will** • **Employment verification** • **English-Only Policies** • **Equal pay** • **ERISA** ERISA - Employee Retirement Income and Security Act of 1974				

PRACTICE NAME: _____

• **Estoppel** • **Exceptions to policies**-Avoid Favors and Exceptions to Policies • **Exclusions from regular rate of pay** • **Exempt and non-exempt** • **Exemptions – FLSA** • **Exit interviews** • Expectation of privacy • Expense reimbursements • **Facial hair** • **Fair Credit Reporting Act** • **False imprisonment** • **Falsification** • **Favors for employees** • **Final pay** • **FLSA** • **Fluctuating workweeks** • **FMLA** • **Fraud** • **Fringe benefits** • **Full-time employment** • Funeral leave • Furloughs • **Garnishment** • **Genetic information** • Grievances • Grooming Standards • **Hair length and style** • **Harassment** • **Health insurance benefits (30-hour/week eligibility rule)** Part-Time / Full-Time Status • **Healthy working conditions**-OSHA - Workplace Safety and Health Requirements • **HIPAA**- HIPAA Privacy Rule - What Employers Need to Know				

PRACTICE NAME: _____

• **Hiring** • **Holding final paycheck** • **Holidays** • **Hostile working environment** • Hourly employees • Hours worked • **I-9** • **Identity theft** • **Incentives** • **Inclement weather** • **Independent contractor criteria** • **Intentional infliction of emotional distress** • **Internet policies** • **Interns** • **Interviews** • **Invasion of privacy** • Investigations • IRS • **Job applications** • **Job descriptions** • **Job injuries**-Workers' Compensation • **Job offers** • **Job postings** • **Job references** • **Job titles** • Joint employment • Jury duty • **Layoffs** • **Leave – FMLA/Military/Vacation/Sick** • **Leaves of absence** • **Liquidated Damages** • **Loyalty**-Conflict of Interest • **Lunch Breaks** • **Mandatory overtime** • **Medical absences**				

PRACTICE NAME: _____

• **Medical examinations**-Pre-Employment Tests and Examinations • **Medical information confidentiality** • **Medical leave** • **Meetings** • **Metal detectors** • **Methods of pay** • **Military leave** • **Misappropriation** • **Misconduct** • **Misrepresentation** • Monitoring computer use • Monitoring telephone use • **New hire reporting** • **No-fault attendance policies** • **Non-competition agreements** • **Notice of absence or tardiness** • **Notice of discharge** • **Nurses - mandatory overtime** • **Nursing mothers** • **On-call time** • **OSHA** • **Outside sales representative** • Overqualified • Overtime paid • **Paid holidays** • **Paid leave** • **Parental leave** • **Part-time employment** • **Paydays** • **Pension benefits** • **Performance evaluations** • **Personal leave** • **Personal time off (PTO)** • **Personnel files**				

PRACTICE NAME: _____

• **Physical agility tests** • **Pieceworkers** • **Piercings** • **Poor work performance or attitude** • **Posters for the workplace** • **Pre-employment tests** • **Pregnancy rights** • **Privacy** • **Probationary Periods** • Progressive discipline • Property return security deposit agreement • **Receipt of handbook** • **Recording of calls and conversations** • **Recording working time** • **Recordkeeping** • **Reduction in Hours** • **References** • **Refusal of suitable work** • **Refusal to sign policies or warnings** • **Reimbursement of Employees' Expenses** • **Retaliation** • Right to work • Rounding of time clock records • **Safety** • **Salary discussions** • **Search policy** • **Searches** • **Security** • **Severance benefits** • **Sexual harassment** • **Sick leave** • **Smoking** • **Social media** • **Student interns** • **Surveillance**				

PRACTICE NAME: _____

• **Tardiness** • **Tattoos** • **Telephone monitoring** • **Temporary employees** • **Termination** • **Termination checklist** • **Time clocks** • **Time worked** • **Timecard policies** • **Trade secrets** • **Trainees** • **Training time** • **Travel time** • **Two-week notice rule (resignation or discharge)** • Unemployment claims • Uniforms • **Vacancies** • **Vacation leave** • **Verification of SSNs** • **Video surveillance** • **Voluntary leave incentives** • Volunteers • Voting time off • **Wage and hour law - advanced topics** • **Wage deduction authorization agreement** • **Wage overpayments** • **Wages – delivery** • **Wages in lieu of notice** • **Warnings** • **Weapons** • **Wiretapping - telephone monitoring** • **Work separation issues – general** • **Workers' compensation** • **Working interview**				

PRACTICE NAME: _____

• Workplace investigations				
ERISA				
CLIA				
LIMITED ENGLISH PROFICIENCY				
CREDENTIALING				
Hospital(s)/ASC etc				
Medicare/Medicaid				
Managed Care				
STATE MEDICAL BOARD REGS & GUIDANCE				
• Abandonment • Abortion • Acquired Immune Deficiency Syndrome (AIDS) -- HIV • Advertising • Alternative Medicine • Anesthesia, office-based • Chaperones • CME • Confidentiality • Consultative Peer Review • Coverage of Practice • Death Issues • Delegation of Medical Acts • Disciplinary Action by State Medical Board				

PRACTICE NAME: _____

• Disclosure of Conflicts to Patients
• Drugs
  o Anti-substitution Laws and Generic Prescriptions
  o Disposition of Samples
  o Labeling
  o Drug Testing of Medical Staffs
• Duty to Deal Honestly with Patients
• End of Life Care Discussions with Patients
• Gifts from Industry
• Gifts from Patients
• Impaired Physicians
• Internet Prescribing
• Licensure
• Managed Care
• Marketing of Health Care Services
• Medical Necessity
• Medical Malpractice Insurance
• Medical Practice Act
• Medical Records
• Mid Level Providers
• Nurse Anesthetists
• Organ Donors
• On-call Physician
• Pain Management
• Patient Disclosure
• Patient Medical Records
• Patient's Rights Upon Physician's Departure from a Group
• Patient Transfer
• Physician Assistants
• Prescriptions-Electronic
• Prescription Pads
• Principles of Medical Ethics, AMA
• Professional Courtesy				

PRACTICE NAME: _____

• Professional Relationships • Relation of Law and Ethics • Sale of Health Related Products from Physicians' Offices • Sexual Misconduct • Standing Orders • Surgical Assistants • Telemedicine • Termination of the Patient-Physician Relationship • Treatment of Family Members and Friends • Unsolicited Medical Screening Test Results				
ICD-10 COMPLIANCE TIMELINE				
INFECTION CONTROL & QA				
• OSHA • Handwashing • Disposal of Drug Samples • Multi-dose drug vials • Cleaning, disinfection and sterilization of instruments • Single use disposable items • Housekeeping/Janitorial • Crash Cart • Expired Drugs • Equipment check, annual • Eye wash station checking • Fire Extinguisher Checks • Refrigerator contents and temps • Autoclave				

PRACTICE NAME: _____

• Glucometer/Urinalysis etc machines – calibration/testing				
COMPLIANCE ISSUES IDENTIFIED AND ADDRESSED WITH INDIVIDUAL (S) INVOLVED				

COMPLIANCE ACTION CHECKLIST

PRACTICE NAME: _____

PRACTICE NAME: _____

INDEX TO HIPAA ANNOTATED FINAL PRIVACY REGULATIONS (CFR 45 Part 160-164)

SECTION NO.	DESCRIPTION	REG. CHANGES/ dates	OFFICE POLICY NO.	COMMENTS
Part 160, Subpart A	**General Requirements**			
§ 160.101	Statutory basis and purpose			
§ 160.102	Applicability			
§160.103	Definitions			
§160.104	Modifications			
Part 160, Subpart B	**Preemption of State Laws**			
§160.201	Applicability			
§160.202	Definitions			
§160.203	General Rule and exceptions			
Part 160, Subpart C	**Compliance and Enforcement**			
§160.300	Applicability			
§160.302	Definitions			
§160.304	Principles of achieving compliance			
§160.306	Complaints to the secretary			
§160.306(a)	Right to file a complaint			
§160.306(b)	Requirements for filing a complaint			
§160.306(c)	Investigation			
§160.308	Compliance Reviews			
§160.310	Responsibilities of covered entities			
§160.310 (a)	Provide Records and compliance reports			
§160.310 (b)	Cooperate with complaint investigations and compliance reviews			
§160.310 (c)	Permit access to information			
Part 164, Subpart A	**Statutory Basis**			
§164.106	Relationship to others			
Part 164,	**Privacy**			

COMPLIANCE ACTION CHECKLIST

PRACTICE NAME: _____

Subpart E				
§164.500	Applicability			
§164.501	Definitions			
§164.502	**Uses and Disclosure**			
§164.502(a)	Standard			
§164.502(b)	Minimum Necessary			
§164.502(c)	Agree upon restriction			
§164.502(d)	De-identified health information			
§164.502(e)	To business Associates			
§164.502(f)	Deceased			
§164.502(g)	Personal Representatives			
§164.502(h)	Confidential Communications			
§164.502(i)	Consistent with notice			
§164.502(j)	Whistleblowers and Workforce crime victims			
§164.504	**Organizational Requirements**			
§164.504(a)	Definitions			
§164.504(e)	Business Associate Contracts			
§164.506	**Consent (Optional)**			
§164.506(a)	Permitted uses and disclosures			
§164.506(b)	Consent is permitted			
§164.506(c)	Implementation for TPO			
§164.508	**Authorization Required**			
§164.508(a)	Authorization			
§164.508(b)	General Requirements			
§164.508(b)(1)	Valid authorizations			
§164.508(b)(2)	Defective authorizations			
§164.508(b)(3)	Compound authorizations			
§164.508(b)(4)	Prohibition of conditioning			
§164.508(b)(5)	Revocation			
§164.508(c)	Core elements			
§164.508(c)(3)	Plain language			
§164.508(c)(4)	Copy to individual			
§164.512	**Authorization Not Required**			
§164.512(a)	Required by law			
§164.512(b)	Public Health Activities			
§164.512(c)	Victims of abuse, neglect or domestic violence			

PRACTICE NAME: _____

§164.512(d)	Health Oversight Activities			
§164.512(e)	Judicial and Administrative Proceedings			
§164.512(f)	Law enforcement purposes			
§164.512(f)(2)	➢ For identification and location purposes			
§164.512(f)(3)	➢ Victims of crime			
§164.512(f)(4)	➢ Decedents			
§164.512(f)(5)	➢ Crime on premises			
§164.512(f)(6)	➢ Reporting crime in emergencies			
§164.512(g)	Decedents			
§164.512(h)	Cadaveric organ, eye or tissue donation			
§164.512(i)	Research purposes			
§164.512(i)(1)	➢ IRB or Privacy Board			
§164.512(i)(2)	➢ Documentation of waiver			
§164.512(j)	To avert serious threat to health or safety			
§164.512(j)(2)	➢ Use or Disclosure not permitted			
§164.512(j)(3)	➢ Limit on info to be disclosed			
§164.512(j)(4)	➢ Preemption of good faith			
§164.512(k)	Specialized government functions			
§164.512(k)(1)	➢ Military and veterans activities			
§164.512(k)(2)	➢ National Security and Intelligence			
§164.512(k)(3)	➢ Protective services to the President			
§164.512(k)(4)	➢ Department of State Medical Suitability			
§164.512(k)(5)	➢ Correctional Institutions			
§164.512(k)(6)	Government programs, Providing Public Benefits			
§164.512(k)(6)(i)	➢ Health Plan			
§164.512(k)(1)(ii)	➢ Administering Public Benefits			
§164.512(l)	Worker's Compensation			
§164.514	**Identifiers, Minimum Necessary, Limited Data Set**			
§164.514(a)	De-identification			
§164.514(b)(2)(i)	Identification elements			
§164.514(c)	Re-identification			
§164.514(d)	Minimum necessary			
§164.514(e)	Standard Limited Data Set			

§164.514(f)	Fundraising			
§164.514(g)	Underwriting			
§164.514(h)	Verification Requirements			
§164.514(h)(1)(i)	➢ Identify Individual			
§164.514(h)(1)(ii)	➢ Obtain Documentation			
§164.514(h)(2)(ii)	➢ Identity of Public Officials			
§164.514(h)(1)(iii)	➢ Authority of Public Officials			
§164.520	**Notice of Privacy Practices**			
§164.520(a)	Right to Notice			
§164.520(b)	Content of Notice			
§164.520(b)(1)	➢ Required elements of notice			
§164.520(b)(1)(iii)	➢ Separate Statements			
§164.520(b)(1)(iv)	➢ Individual Rights			
§164.520(b)(1)(v)	➢ Covered Entities Duties			
§164.520(b)(2)	➢ Optional Elements			
§164.520(c)	Provision of Notice			
§164.520(c)(1)	➢ Health Plan Requirements			
§164.520(c)(2)	➢ Provider Requirements			
§164.520(c)(3)	➢ Electronic Notice			
§164.520(d)	Joint notice of Separate CE's			
§164.520(e)	Documentation			
§164.522	**Requesting Restrictions & Confidential Communication**			
§164.522(a)	Request Restrictions			
§164.522(b)	Confidential Communications			
§164.524	**Access to PHI**			
§164.524(a)(1)	Right to access			
§164.524(a)(1)(i)	➢ Psychotherapy Notes			
§164.524(a)(1)(ii)	➢ Use in Civil, Criminal or Administrative Action			
§164.524(a)(2)	Unreviewable grounds for denial			
§164.524(a)(3)	Reviewable Grounds for denial			
§164.524(b)	Requests for Access			
§164.524(b)(2)	➢ Timely Action			
§164.524(c)	Provision of Access			
§164.524(c)(4)	➢ Fees			

§164.524(d)	Denial of Access			
§164.524(e)	Documentation			
§164.526	**Amendment of PHI**			
§164.526(a)(1)	Right to amend			
§164.526(a)(2)	Denial of Amendment			
§164.526(b)	Timely Action			
§164.526(c)(1)	Accepting the Amendment			
§164.526(d)	Denying the Amendment			
§164.526(e)	Actions of notices of Amendment			
§164.526(f)	Documentation			
§164.528	**Accounting of Disclosures**			
§164.528(a)	Right to accounting			
§164.528(a)(1)	Exceptions to accounting			
§164.528(a)(1)(i)	¡ For TPO			
§164.528(a)(1)(ii)	¡ To individuals about them			
§164.528(a)(1)(iii)	¡ Otherwise as permitted in general uses and disclosures - §164.502			
§164.528(a)(1)(iv)	¡ Pursuant to authorization			
§164.528(a)(1)(v)	¡ For facility directory or persons involved in care			
§164.528(a)(1)(vi)	¡ National Security of Intelligence Purposes			
§164.528(a)(1)(vii)	¡ To correctional institutions			
§164.528(a)(1)(viii)	¡ As part of limited data set			
§164.528(a)(1)(ix)	¡ That occurred prior to compliance date			
§164.528(b)(2)	Content of accounting			
§164.528(b)(3)	Multiple disclosures to the same person or entity			
§164.528(b)(4)	Accountings for research			
§164.528(c)	Provisions of accounting			
§164.528(d)	Documentation			
§164.530	**Administrative Requirements**			
§164.530(a)	Personnel Designations			
§164.530(b)	Training			
§164.530(c)	Safeguards			
§164.530(d)	Complaints to covered entity			
§164.530(e)	Sanctions			

PRACTICE NAME: _____

§164.530(f)	Mitigation			
§164.530(g)	Refraining from intimidating or retaliatory acts			
§164.530(h)	Waiver of Rights			
§164.530(i)	Policies and Procedures			
§164.530(i)(2)	↑ Changes to policies and procedures			
§164.530(i)(3)	↑ Changes in the law			
§164.530(i)(4)	↑ Changes to Privacy Practices			
§164.530(j)	Documentation			
§164.532	**Transition Provisions**			
§164.532(a)	Effect of Prior authorizations			
§164.532(b)	Effect of Prior authorizations for purposes other than research			
§164.532(c)	Effects of prior permission for research			
§164.532(d)	Effect of prior contacts with business associates			
§164.532(e)	Deemed compliance			
§164.534	**Compliance Dates**			

PRACTICE NAME: _____

Appendix A to Subpart C of 45 CFR Part 164

Security Standards: Matrix

ADMINISTRATIVE SAFEGUARDS (see §164.308)					
Standards	**Sections**	**Implementation Specifications (R)=Required, (A)=Addressable**		**OFFICE POLICY #**	
Security Management Process	164.308(a)(1)	Risk Analysis	(R)✓		
		Risk Management	(R) ✓		
		Sanction Policy	(R) ✓		
		Information System Activity Review	(R) ✓		
Assigned Security Responsibility	164.308(a)(2)		(R) ✓		
Workforce Security	164.308(a)(3)	Authorization and/or supervision	(A) ✓		
		Workforce clearance procedure	(A) ✓		
		Termination Procedures	(A) ✓		
Information Access Management	164.308(a)(4)	Isolating Health Care and Clearinghouse Function	(R) n/a		
		Access Authorization	(A) ✓		
		Access establishment and modification	(A) ✓		
Security Awareness and Training	164.308(a)(5)	Security reminders	(A)		
		Protection from malicious software	(A) ✓		
		Log-in monitoring	(A) ✓		
		Password management	(A) ✓		
Security Incident Procedures	164.308(a)(6)	Response and Reporting	(R) ✓		
Contingency Plan	164.308(a)(7)	Data Backup Plan	(R) ✓		
		Disaster Recovery Plan	(R) ✓		

PRACTICE NAME: _____

		Emergency Mode Operation Plan	(R) ✓		
		Testing and Revision Procedure	(A) ✓		
		Applications and Data Criticality Analysis	(A) ✓		
Evaluation	164.308(a)(8)		(R) ✓		
Business Associate Contracts and other Arrangements	164.308(b)(1)	Written Contract or other arrangement	(R) ✓		
PHYSICAL SAFEGUARDS (see §164.310)					
Standards	Sections	Implementation Specifications (R)=Required, (A)=Addressable		**OFFICE POLICY #**	
Facility Access Controls	164.310(a)(1)	Contingency Plans	(A) ✓		
		Facility Security Plan	(A) ✓		
		Access Control and Validation Procedures	(A) ✓		
		Maintenance Records	(A) ✓		
Workstation Use	164.310(b)		(R) ✓		
Workstation Security	164.310(c)		(R) ✓		
Device and Media Controls	164.310(d)(1)	Disposal	(R) ✓		
		Media re-use	(R) ✓		
		Accountability	(A) ✓		
		Data Backup and storage	(A) ✓		
TECHNICAL SAFEGUARDS (see §164.312)					
Standards	**Sections**	**Implementation Specifications (R)=Required, (A)=Addressable**		**OFFICE POLICY #**	
Access Control	164.312(a)(1)	Unique User Identification	(R) ✓		
		Emergency Access Procedure	(R) ✓		
		Automatic Logoff	(A) ✓		
		Encryption and Decryption	(A) ✓		
Audit Controls	164.312(b)		(R) ✓		

COMPLIANCE ACTION CHECKLIST

PRACTICE NAME: _____

Integrity	164.312(c)(1)	Mechanism to Authenticate Electronic Protected Health Information	(A) ✓		
Person or Entity Authentication	164.312(d)		(R) ✓		
Transmission Security	164.312(e)(1)	Integrity Controls	(A) ✓		
		Encryption	(A) ✓		

COMPLIANCE ACTION CHECKLIST

PRACTICE NAME: _____

HITECH PROVISIONS OF THE AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009

Title XIII, Subtitle D, Privacy, American Recovery and Reinvestment Act of 2009; Public Law No: 111-5

Title	Description	What	Who	OFFICE POLICY NO.	COMMENTS
13400	**Definitions**				
13401	**Security and Penalty Provisions**	Business Associate agreements shall incorporate additional requirements of title	Business Associates of HIPAA Covered Entities		
13402	**Breach Notifications**	Written notification by mail and if urgent, by telephone Breaches if over 500 affected individuals report to media and DHHS Less than 500 affected submit log annually	HIPAA Covered Entities & Business Associates		
13403	**Education on Health Information Privacy**	OCR establish national education initiative	DHHS OCR		
13404	**Privacy Provisions to Business Associates**	Applies HIPAA civil and criminal penalties to business associates that violate privacy provisions	Business Associates of Covered Entities		
13405	**Restrictions of Disclosures** **Limited Data Sets**	Covered entities must comply with individual requests for restrictions of disclosure of information when individual has paid out of pocket in full for services.	HIPAA Covered Entities		
13405	**Accounting of Disclosures** **Prohibition of Sale** **Access to Information**	Covered entities shall limit access, uses or disclosures to limited data sets to extent practicable	HIPAA Covered Entities		
		Limits period for accounting of disclosures to 3 years from EHRs	HIPAA Covered Entities		