

Policy Changes for HIPAA Privacy Policies Board Approval 7.26.17

Policy No.	Policy Name	Policy Change
P1.1	Master Policy	Section 7: Minimum Necessary - Routine Uses & Disclosures of PHI - added "for the list of permitted categories of PHI" to direct employees to the Access, Use, and Disclosure Standard Operating Procedure. Section 12: added "Requirements" to "Verification" in the header. Removed "employees will be required to sign a Confidentiality Agreement each year after HIPAA privacy and security awareness training" per new case law in 2016 that may make contracts unenforceable because there is not additional consideration paid in connection with re-signing the agreement. For HIPAA training purposes, it is sufficient to have the employees acknowledge that they have received annual HIPAA training and understand that they are obligated to comply with HIPAA and our policies & procedures.
P1.2	Definitions	Added definition for Employee Confidentiality Agreement (#12); removed definition for the Worker Confidentiality, Non Disclosure, Non Solicitation Agreement (replaced by Employee Confidentiality Agreement)
P1.3	Business Associate Agreements	No Content Change
P1.4	Non-Routine Uses and Disclosures	No Content Change
P1.5	Personal Representatives	No Content Change
P1.6	De-Identified Information/Re-Identification	No Content Change
P1.7	Sale of PHI	No Content Change
P1.8	Privacy Incident Reporting and Breach Notification	No Content Change
P1.9	Request for Restrictions	No Content Change
P1.10	Individual's Access to PHI	No Content Change - addition of one word
P1.11	Amendment	No Content Change
P1.12	Accounting of Disclosures	No Content Change
P1.13	Social Media	No Content Change
P1.14/S4.1	Training and Awareness	Removed reference to annual signing of the CA
P1.15/S4.2	Sanctions	No Content Change
P1.16/S4.3	Privacy/Security Documentation	No Content Change - updated reference to Disposal of PHI Policy from S4.5 to S2.21