

HIPMA Pre-Implementation Audit

Disclaimer for Custodians: This is a sample only. It may not be suitable for your circumstances and should not be relied on as legal advice.

Verifying Key Steps

Instructions

This document is for custodians to use, or to distribute to their managers for completion, in order to confirm staff and agents have completed certain key steps before HIPMA and its regulations come in to force. We recommend that this audit be done two weeks before HIPMA's in force date.

NOTE: HIPMA has many requirements for Custodians. Please refer to the "Readiness Checklist for Custodians" for a more detailed list of these requirements.

- ✓ Have all staff and other agents completed their privacy training and signed a pledge of confidentiality?
- ✓ Have you created Privacy Notice/Posters and placed them in registration, waiting and entrance or other areas so they are readily available? Are the right staff familiar with the document and able to assist people who cannot read or understand it?
- ✓ Have you made your "Written Statement of Practices for the Public" document available to the public, either through printed pamphlets or online? Are your staff and agents familiar with its contents should people have questions?
- ✓ Do staff and agents know who your HIPMA contact person is and how to contact them? Do they know how to access your written privacy policies?
- ✓ In particular, do your staff know what to do if one of the following happens:
 - An individual makes a privacy complaint
 - An individual wants to know who has looked at their PHI stored in your computer systems
 - Staff identify a breach in your area
 - An individual asks that his/her information not be disclosed to another health care professional in order to provide him/her with care
 - An individual wants a copy of their health record or a correction made to their health record?
- ✓ Have you held a team meeting to give people an opportunity to raise questions or concerns?