

Texas Tech University Health Sciences Center El Paso HIPAA Privacy Policy

Monitoring Use and Safeguards of PHI	Policy: HPP 2.1
HIPAA Audits	Effective Date: July 1, 2016
References: http://www.hhs.gov/ocr/hipaa/	
TTUHSC El Paso HIPAA Website: http://elpaso.ttuhs.edu/hipaa/	

Policy Statement

It is the policy of the Texas Tech University Health Sciences Center El Paso (TTUHSC El Paso) to ensure patient's health information is used appropriately by faculty, employees and contractors, students, residents and volunteers. Audits will be used to monitor compliance with HIPAA regulations and TTUHSC El Paso HIPAA policies and procedures, and to assist in reducing risk of non-compliance.

Scope

This policy applies to all PHI maintained by TTUHSC El Paso.

Policy

Definitions

Refer to [HPP 1.1 for Glossary of HIPAA Terms](#)

Procedure

For-cause and routine audits will be conducted by the Institutional Privacy Officer to ensure compliance with HIPAA rules and regulations as well as TTUHSC El Paso policies and procedures.

For-cause audits are those related to known or suspected concerns/issues. For-cause audits will be conducted depending on the level of risk the issue/concern presents to the institution. High risk issues i.e., high probability of a violation of HIPAA regulations and/or TTUHSC El Paso policy would be considered more urgent and audited as soon as feasible within the current year's work plan. Other issues may be lower risk and may be scheduled in a future work plan.

Routine audits include Privacy Assessments of clinical departments, which are conducted quarterly.

Audits consist of one or more of the following:

- Staff/faculty interviews to determine general knowledge of responsibilities in protecting PHI;
- Review of policies and procedures;
- Review of records to verify compliance;
- Observed staff practices;
- Facility inspection to insure required postings and controls are in place.

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Audit results will be communicated to the Department head/Administrator for corrective action if any, and in some cases to the HIPAA Privacy and Security Committee (HPSC).

Knowledge of a violation or potential violation of this policy must be reported directly to the Institutional Privacy Officer or to the employee Fraud and Misconduct Hotline at (866) 294-9352 or www.ethicspoint.com under Texas Tech University System.

Frequency of Review

The TTUHSC El Paso Privacy and Security Committee have authority for HIPAA policy approval.

Questions regarding this policy may be addressed to the [Institutional Privacy Officer](#) or the [Institutional Compliance Officer](#).

This policy may be amended or terminated at any time.

Review Date: July 8, 2019

Revision Date: February 2, 2017, July 16, 2019