

SAMPLE HIPAA POLICIES AND PROCEDURES

POLICY. Our pharmacy is a HIPAA Covered Entity. As a result, we will conduct our prescription operations in compliance with the requirements of the Privacy and Security Rules to the best of our resources. Our goal is the protection of the confidentiality and accuracy of our patients' PHI. Our success in reaching and maintaining that goal depends on the attentive commitment of every one of our employees whose positions include access to PHI.

PROCEDURES.

1. We have appointed a Privacy/Security Official to have overall authority to oversee the operations of our HIPAA compliance efforts. Any employee unsure of what to do, or what not to do, when faced with a question concerning the use and disclosure of a patient's PHI must consult the Official or the Official's designee on duty at the time.
2. Every employee with access to PHI must attend each training held by our pharmacy and complete the Certification. Our pharmacy may decide from time to time to add brief quizzes or training. A failure to achieve a passing grade of 75% may call for additional individual training.
3. All viewing use or disclosure of PHI is on a strict need to know, patient care, basis. Any failure to adhere to that limitation may result in disciplinary action including termination of employment.
4. Assigned passwords are not to be shared with anyone else. Password will be changed from time to time as a security measure.
5. We recognize that our pharmacy may be exposed to various risks that if realized could unlawfully disclose or otherwise damage the confidentiality, integrity and availability of our patient's PHI.
6. For the purpose of avoiding such potential risk and also to mitigate the resulting damage we have undertaken a risk analysis, a risk management plan and a disaster plan.
7. Overall, we adopt the contents of this manual as detailed statement of our policies and procedures.

We suggest using the HIPAA Checklist enclosed to create a comprehensive plan for your pharmacy.