

## **THE PRIVACY OFFICIAL'S**

### **JOB DESCRIPTION**

The Privacy and Security Official's position in the pharmacy carry overall responsibility for the development and implementation of policies and procedures that protect the privacy and security of the PHI of our patients, and that are HIPAA compliant. Examples of the types of tasks involved include the following:

- 1) Receives and retains HIPAA information that arrives at the pharmacy from time to time and distributes such information to pharmacy employees in such form as the Official believes will be most effective in terms of employee training;
- 2) Oversees necessary amendments to Notice of Privacy Policies as well as the posting of the amended version and its distribution to the patients;
- 3) In conjunction with other pharmacy employees and with pharmacy ownership conducts a written assessment of potential risks faced by the pharmacy that could compromise the confidentiality, integrity, accuracy and availability of the pharmacy's ePHI together with a written record of steps taken to avert such risks;
- 4) Initiates or actively participates in the development of the pharmacy's employee training program and oversees its implementation;
- 5) Oversees the application of employee sanctions developed by the pharmacy when employee HIPAA violations are discovered;
- 6) Establishes and oversees procedures for accounting for disclosures of PHI and for other PHI record keeping and record retention;
- 7) Resolves issues related to the disclosure of PHI to personal representatives when such questions arise, and determines how the principle of "minimum necessary" should be applied;
- 8) Oversees the operation of Business Associate agreements;
- 9) Works with the designated Contact Person to resolve patient complaints related to HIPAA; and,
- 10) Cooperates with duly authorized officials in the course of compliance reviews or investigations related to HIPAA compliance.