

UW Healthcare Component Compliance Group

Meeting Date: 5-20-13 Time: 3:30 pm Location: HSC E-212

Name	✓	School
Dave Anderson	✓	HS Administration
Peggy Smith	✓	HS Administration
Jane Yung	✓	Attorney General's Office
Suzanne Mason	✓	EH&S
Anish Padath	✓	EH&S
Nancy Alarcon	✓	Speech & Hearing Sciences
Tara Aal	✓	School of Dentistry
Jerry Arnold	✓	School of Dentistry
Cathy Brock	✓	Autism Center
Michele Jacobs	✓	Psychology
Katie Korslund	✓	Psychology
Amanda Patrick	✓	Psychology
Jon Hauser		Psychology
Richard Meeks	✓	UW Medicine Compliance
Suzanne McCoy		UW Medicine Compliance
Jeri Carter		UW Tacoma Student Wellness
Paul Henderson		UW Medicine IT
Gretchen Williams	✓	Pharmacy
Kirk Bailey		CISO (<i>Alternate for Ann Nagel</i>)

HSA Executive Director

- Dave Anderson recognizes time, effort, training to implement these changes before 9/23/2013 in addition to operational, quality of care issues, and continued regulatory, operational creep
- Dave's purview is privacy and is committed to a responsive, centralized response from HSA
- HSA will do a better job of pushing information out to components, and enlisting/advocating for support, better tools to promote effective compliance
- Dave plans to visit component clinics, request support from Richard Cordova (Internal Audit) to assist with revolving schedule of audits, to make certain we're not missing anything

NOPP revisions

- Use UW Medicine Compliance template; omitting UW Medicine specific language/identifiers
- NOPP must relate to each individual component covered under the hybrid entity
- Use date of revision as effective date (rather than 5/15/13 unless approved, implemented by then)
- Revisions and changes completed and operational before 9/23/13

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UW Medicine Compliance – HIPAA Changes Education and Outreach

- Suzanne McCoy will have training presentation available by July
- Richard Meeks recommends reviewing UWMC approved policy emails distributed by Stephanie but wait until Suzanne's presentation to enact

Actual or suspected breach notifications

- 5-20-13 is effective date for HSA notification; retroactive reporting not necessary
- Immediately notify Dave Anderson, HSA Executive Director, danderso@uw.edu, 206-543-7202 of all suspect issues in order to appropriately activate the 60 day analysis period
- UW Medicine Compliance is the content expert, HSA will notify Richard Meeks, Suzanne McCoy
- Continue to maintain log of accidental disclosure
- Richard Meeks reminded group that analysis of compromises reportable under notification requirements has changed significantly
- Jane Yung reiterated that any unauthorized mistake must be reported to Dave Anderson ; the former harm threshold and significant risk has been removed

Group Discussion

- Recognize ramifications of portable devices, social media, other technology issues; observations of individuals not using passwords on smart phones, etc.
- Remediation plan for individuals having challenges protecting PHI; Richard Meeks stated sanctions determined between manager/HR/academic disciplinary code
- HIPAA Training, even for those not directly supervised, provides additional reinforcement of privacy compliance

Action Points

- Re-distribute NOPP Word document with track changes (Peggy 5/21/13)
- Update roster of component clinics by re-sending list to members (Peggy)
- Send revised component updated NOPP with track changes to Peggy: psmith83@uw.edu
- Forward and track revised NOPPs to UW Medicine Compliance (Peggy)