



Privacy Officer Investigation Procedure for Your Practice

1. Privacy Officer (PO) becomes aware of complaint.
2. PO investigates within 10 days.
3. If complaint concerns physician, practice manager consultation sought.
4. If serious or complex issue, Privacy Officer consults practice manager and/or Munson Medical Center Privacy Officer.
5. Privacy Officer and/or Practice Manager interview employee.
6. Employee is given chance to explain her/his perception of what happened, regarding breach allegation. Employee is shown audit results.
7. Privacy Officer consults with practice manager and/or Human Resources to determine appropriate disciplinary action to prevent reoccurrence: re-education, counseling note, written warning, final written warning, or termination.
8. If Privacy Officer questions if serious harm (emotional, financial or reputational) may come to patient who's medical records have been breached, or if the content of the record breached contained sensitive information (mental health records, drug treatment records, STD, or HIV status etc.) Privacy Officer consults with Munson's Privacy Officer regarding the Breach Notification Letter and report to Health & Human Services (HHS).
9. Privacy Officer should keep a documentation file of all the details of the complaint, date discovered, date acted upon, what happened, who was involved, disciplinary action taken, and any other remedial action steps.
10. For any large scale breach, such as loss of laptop, thumb drive, or CD with patient information, Privacy Officer should immediately inform Munson's Privacy Officer for security assistance.

For serious or complex HIPAA issues or if you need to report a privacy breach, please feel free to contact Rochelle Steimel, Munson HIPAA Privacy Officer, at **(231) 935-5765**.