



The Privacy Officer Role in the Physician Office – What It Entails

1. Your job is to investigate, document and record privacy complaints by talking to the patient and staff about what happened, recording the details, and making a plan to prevent any future privacy breach. Serious or large breaches are reported to Munson Medical Center's Privacy Officer.
 - a. A Breach Notification letter to patient is mandated only if the patient has been seriously harmed (financially, emotionally, legally, or by reputation) by the breach.
2. If your investigation finds that the allegations of privacy breach (serious or minor) are substantiated, the Privacy Officer discusses the issue with physician administrators and/or human resources to plan for appropriate disciplinary consequence or re-education.
3. The Privacy Officer ensures the entire office is "HIPAA Compliant." In brief:
 - a. Post a copy of the Notice of Privacy Practices (NOPP) and document that NOPP has been offered to and is available to all patients.
 - b. Assure patient names and medical information are kept private and out of sight & earshot; computer screens are turned from public view; faxes cover sheets are used.
 - c. Policies must address HIPAA compliance. See www.hhs.gov/ocr/privacy for audit program protocol that addresses Privacy and Security regulations that must be reflected in policy. (Munson policies already address Security needs.)
 - d. Train Staff annually regarding HIPAA education.
 - e. Create procedures to comply with patient's request for a copy of their record.
 - f. Create procedures to comply with patient's request to amend errors in record, or requests that phone calls and mail to their home be made more confidential.
 - g. Disclose patient medical information only to staff and agencies that have a job-related need to know, such as for treatment or payment. Verify the identity of outside agencies who ask for information, by getting their request on agency letterhead.
 - h. Do not share patient information with others unless you have the patient's permission or his/her signed Release of Information.
 - i. Consider asking all staff to sign a Confidentiality Agreement upon hire.
4. The Privacy Officer helps the patient understand:
 - a. Patient privacy is important to your office and you have procedures in place to protect privacy and confidentiality. All complaints are thoroughly investigated.
 - b. Medical information will be disclosed for the purposes of treatment, payment, and operations, and for other exceptions allowed by state and federal law.