



# Audit Brief

## UMC HIPAA Compliance Review

Twenty-seven UMC cost centers achieved a compliance rate of 93% in awareness and application of privacy and security policies.



### Why we did this audit

We performed the third of a three-part audit of UMC employees' HIPAA awareness and understanding of its privacy and security policies and their use of appropriate safeguards to protect health information based on our annual audit plan.

### Background

UMC, as a covered-entity under the Health Insurance Portability and Account Act of 1996 (HIPAA), is required to have administrative, physical and technical safeguards in place that meet the privacy and security standards. Policies and procedures, awareness training and annual refresher training are provided to employees on patient rights, appropriate use of information systems and secure destruction of information.

UMC's policies require all members of its workforce to comply with the established privacy and security practices. Individual awareness minimizes UMC's risk of denying a patient his rights to privacy and confidentiality.

Using observations and staff interviews, each UMC department is reviewed once in a three-year audit cycle.

This is the third report.

### Summary of Significant Findings

UMC has administrative policies and procedures in place regarding the required privacy and security standards. Eight departments earned commendations for achieving a 100% rating. Consistent with the findings reported in the prior two years we found awareness varies according to job role. Specifically we found:

- Improved awareness about patient privacy rights and how to confirm a patient has received the Notice of Privacy Practices.
- Lack of knowledge about procedures related to how patients exercise their right to request an amendment.
- Increased vigilance by staff and protecting records against loss or unauthorized access.
- Inconsistent compliance to the required disclosure recording procedures.

### We Recommend

- Provide education to Ambulatory Care staff in the amendment procedures.
- Add a soundtrack to programming on ambulatory care lobby televisions to reduce inadvertent disclosures.
- Verify risk assessments are completed to identify vulnerabilities in cost centers.
- Require managers to have documented procedures regarding recording disclosures as required.