

HIPAA Program Management Office Charter

PURPOSE

The purpose of the County HIPAA Program Management Office (HIPAA PMO) is to manage the joint Clark County and UMC HIPAA compliance remediation and on-going compliance governance requirements in accordance with the Health Insurance Portability and Accountability Act (HIPAA) regulations put forth by the United States Department of Health and Human Services (DHHS). This compliance effort covers all areas of HIPAA compliance requirements including Privacy, Security, Electronic Transactions, and the County's HIPAA-defined Business Associates.

The mission of the County HIPAA PMO is to effectively and efficiently manage support staff to meet all applicable HIPAA privacy, security, and electronic healthcare transaction compliance regulations; oversee, coordinate, and facilitate the activities of various compliance/implementation workgroups; and provide effective communication about the County's HIPAA Program to internal and external stakeholders.

ORGANIZATION

The HIPAA PMO is a division of the Clark County Audit Department and consists of, at a minimum, a HIPAA Program Manager and Privacy Officer. The mandated HIPAA Security Officer will work closely with the Program Manager to ensure compliance with the HIPAA Security Regulations. Other team members from various departments that are needed to support project activity will be called upon when necessary.

Program Manager

- Establish PMO
- Supervise Privacy Officer
- Oversee, facilitate, and coordinate activities of workgroups
- Provide regular communication regarding compliance activities
- Identify, develop, and implement HIPAA related best practices
- Manage documentation of compliance activities
- Oversee Security Officer HIPAA duties
- Coordinate information system security reviews

Privacy Officer

- Receive and investigate complaints
- Perform scheduled reviews of areas
- Advise on privacy issues
- Recommend changes to Privacy policies and procedures
- Oversee Privacy training
- Identify, develop, and implement HIPAA related best practices related to Privacy
- Initiate, facilitate, and promote activities to foster privacy awareness within the organization

Security Officer

- Implement Information System Security policies and procedures
- Recommend changes to Information System Security policies and procedures
- Oversee Security training
- Perform information security risk assessments
- Oversee the preparation of disaster recovery and business continuity plans
- Advise on Security issues
- Initiate, facilitate, and promote activities to foster information security awareness within the organization
- Serve as the information security liaison for users
- Review all information system related security plans throughout the organization and act as liaison to the Information Systems Department
- Track developments in information systems security

HIPAA Compliance Committee

The HIPAA PMO will report to the joint Clark County/UMC HIPAA Executive Steering Committee. This committee will include representatives from pertinent areas of both Clark County and UMC, as appointed by the County Manager.

The HIPAA Compliance Committee will meet on a regular basis and receive an update on the following:

- Recommendations for changes to policy
- Types, frequency, and outcomes of investigations
- Status of compliance activities

PROGRAM MANAGEMENT OFFICE ROLES

The major roles of the HIPAA PMO are as follows:

- Development, implementation and on-going management of the County's HIPAA Compliance Program and governance process
- Oversight of development and monitoring of HIPAA Compliance policies and procedures
- Development and monitoring of HIPAA Compliance education and training programs
- Development and implementation of effective lines of HIPAA Compliance Program communications and reporting mechanisms
- Development and implementation of appropriate oversight committees to enforce sanctions and disciplinary actions for violations of HIPAA regulations or County policies
- Monitoring and auditing for on-going HIPAA compliance
- Investigation of reported/detected non-compliance incidents and development of corrective action initiatives

Due to professional restrictions placed on the Audit Department, under which the HIPAA PMO is located, the PMO cannot create or implement organizational policies and procedures. These will be the responsibility of covered departments. Likewise, ongoing operational compliance will be the covered department's responsibility. The PMO will only monitor compliance activities, advise on compliance issues, investigate potential areas of non-compliance, and report on compliance issues.

AUTHORITY

The HIPAA Compliance Program Management Office has authority to:

- Coordinate and manage HIPAA related projects
- Audit compliance with regulations
- Conduct investigations into allegations of non-compliance
- Seek any information it requires from employees or external parties.
- Document compliance activities
- Develop HIPAA training curriculum
- Develop committees and workgroups for HIPAA compliance