

**MAILER NO. 22  
RE: HIPAA COMPLIANCE  
RECIPIENTS: MEMBER WIDE  
DECEMBER 23, 2011**

December 23, 2011

**RE: HIPAA Security Compliance**

Dear Physician:

As you may have heard, the Office of Civil Rights (OCR) for the Department of Health and Human Services (HHS) will begin auditing covered entities, potentially including physician offices, for HIPAA Compliance beginning as early as next month.

In light of these impending audits, as well as your responsibilities when submitting meaningful use attestations (which includes an attestation that you will conduct a Security Risk Assessment and remedy any violations), and representations under various agreements that involve data sharing, we are encouraging physicians to review their HIPAA Security policies and procedures to determine and supplement them where deemed necessary. Because the use of electronic medical records and the exchange of electronic data are so important to many of the initiatives that we are involved with, the PHO would like to provide you with education and guidance to help in enhancing your HIPAA Security compliance efforts.

While it is your ultimate responsibility to comply with the HIPAA regulations, the PHO plans to assist by providing a sample policy regarding a specific HIPAA Security topic, as well as an explanation regarding implementation of the policy, each month for the next 10 months. This will provide you with an opportunity to implement new Security policies or review existing policies over the course of the next 10 months. At the end of the 10 month period, we would expect that you would have reviewed and updated all of your HIPAA Security policies, and have an organized binder attesting to those updates. This is intended for your protection.

The first policy that we are offering is a "Security Management Policy and Procedure" which deals with a Covered Entity's responsibilities to conduct a risk analysis, engage in continued risk management, define appropriate employee sanctions and information system activity review. A sample policy and informational sheet, with worksheets, is enclosed with this letter.

If you do not wish to continue receiving these notices, please notify us and we will remove you from our mailing list.

Regards,

Dirk deLange  
Executive Director

Enc.

cc: PHO Board of Directors (correspondence only)

P.S. These policies are available on our website at [www.greatermacombpho.com](http://www.greatermacombpho.com).

**HIPAA SECURITY COMPLIANCE**