

## Policy and Procedures Development Matrix

The matrix below was developed by Catholic Health Initiatives to help track the organization’s development of its key policies and procedures and other documents needed for privacy rule compliance. The matrix is keyed to specific sections of the HIPAA medical privacy rule. The matrix identifies specific outcomes and deliverables typically associated with the specific sections of the regulation. It allows the organization to assign a priority level to the development of the document and enables project management and leadership staff to see at a glance whether the document has been completed. Hospitals may want to consider adapting this matrix for their own needs in monitoring progress in privacy policy and procedure development.

For ease of use, an electronic version of the matrix is being made available on the AHA’s HIPAA Web site at [www.aha.org](http://www.aha.org). Click on the “HIPAA” icon under Key Issues.

Policy and Procedures Development Matrix

HIPAA Std. Ref. Key	Completed?	Priority	Regulation Section	Proposed Outcome/Deliverable	Expected Release Date
<b>I. Management of Business Associates</b>					
P.01			§ 164.502 (e) Disclosures to Business Associates	Sample policy and procedure to address the management of business associates. (To include the use of the business associate agreement language, identifying, inventorying, contracting, and recourse for breaches).	
			§ 164.504 (e) Business Associate Contracts	Business Associate Agreement and guidelines on its use	
<b>II. Management of treatment, payment, and health care operations</b>					
P.07			§ 164.512 Uses and disclosures for which consent, an authorization, or opportunity to agree or object is not required.		
P.13			§ 164.532 Effect of prior consents and authorizations	Consent and admission form templates	
P.06			§ 164.510 Uses and disclosures requiring an opportunity for the individual to agree or to object		
<b>III. Management of disclosures for uses OTHER THAN treatment, payment, and health care operations</b>					
P.04 P.05			§ 164.508 Uses and disclosures for which an authorization is required.	Sample policy and procedure to address uses and disclosures for which an authorization is required (including authorization form template to be adapted for specific State regulations).	
P.07			§ 164.512 Uses and disclosures for which consent, an authorization, or opportunity to agree or object is not required.		
P.13			§ 164.532 Effect of prior consents and authorizations	Authorization form template	
P.16			§ 164.528 Accounting of disclosures of protected health information	Policy, procedure and practices for accounting of disclosures of protected health information	
P.08			§ 164.502 (d) Uses and disclosures of de-identified protected health information	Guidelines on when and how to de-identify information	
<b>IV. Notice of Privacy Practices</b>					
P.12			§ 164.530 (i)(4) Changes to privacy practices stated in the notice of privacy practices	Notice of Privacy Practices template Policy, procedure and practice guidelines for maintaining and modifying notice of privacy practices	
<b>V. Management and Application of the Minimum Necessary Use Standard</b>					
P.09			§ 164.502 (b) Minimum Necessary	Sample policy and procedure on application of the minimum necessary requirement Protocol for role based use of PHI and Covered Entity Disclosure and request of PHI.	
<b>VI. Uses and disclosures of protected health information for marketing and fundraising purposes</b>					
P.10			§ 164.514 (e) Uses and disclosures of protected health information for marketing	Policy and procedure for the use of patient information for marketing and development activities.	
P.11			§ 164.514 (e) Uses and disclosures of protected health information for fundraising		
<b>VII. Right to request restriction of uses and disclosures of protected health information</b>					

HIPAA Std. Ref. Key	Completed?	Priority	Regulation Section	Proposed Outcome/Deliverable	Expected Release Date	
P.13			§ 164.522 (a) Rights to request privacy protection for protected health information	Policy and procedure to request additional protections for protected health information.		
			§ 164.522 (b) Confidential communications requirements	Policy, procedure or practices to allow for receipt of PHI at alternative locations or by alternative means.		
<b>VIII. Management of an individual's right to amend and access protected health information</b>						
P.14			§ 164.524 Access of individuals to protected health information	Policy, procedure and practice guidelines to allow for individuals access to and amendment of PHI. Right to amend protected health information form		
P.15			§ 164.526 Amendment of protected health information	Written notice of denial notices for access to PHI		
				Written notice of denial to amend protected health information		
<b>IX. Other Administrative Standards</b>						
P.17			§ 164.530 (a) Personnel designations	Privacy Official Job Description and Guidance		
				Appointment of Privacy Official		
				Privacy Official Education and Training		
P.18			§ 164.530 (b) Training	Policy and procedure for training and recording participation		
				National Education and Training Program		
P.19			§ 164.530 (c) Safeguards	Security policies and procedures		
P.20			§ 164.530 (d) Complaints to the covered entity	Policies, procedures and practices for managing complaints		
P.21			§ 164.530 (e) Sanctions	Policies, procedures and practices for imposing sanctions for violation of privacy practices		
				§ 164.530 (g) Refraining from intimidating or retaliatory acts		Policy on refraining from intimidating or retaliatory acts
				§ 164.530 (h) Waiver of rights		Policy on waiver of rights
P.22			§ 164.504 (b) Health care components § 164.504 (d) Affiliated covered entities	Decision on how organization will define itself with regard to other components of the organization		
			§ 164.530 (i)(2) Changes to policies or procedures and (i)(3) Changes in law	Policy, procedure and practice for maintaining and documenting HIPAA compliance, modifying and developing applicable policies		