

HIPAA

Record Title	Description	Retention	Classification	Comments	Schedule #
	HIPAA(Health Insurance Portability and Accountability Act) Function: To document compliance of county programs that must comply with HIPAA regarding federal privacy and security guidelines for protected health information				
Agency HIPAA Compliance Records	Agency documentation, including privacy operating procedures, program privacy officer list, policies, assessments, surveys, and business associate agreements/contracts. Includes any other background documentation required to show due diligence.	6 years or longer as needed for administrative purposes	Exempt 45 CFR Parts 160, 162 & 164	Approved by GRAMPA 06/18/2003	HP-001
Complaint Files	Complaints filed by clients that Include complaint forms, research and documentation, resolution letters, and copies of materials sent to complainant and other affected parties. These records are maintained at the agency level.	6 years after creation of the record	Exempt 45 CFR Parts 160, 162 & 164	Approved by GRAMPA 06/18/2003	HP-002
County Wide HIPAA Compliance Records	Countywide documentation relating to HIPAA, the federal rule on medical records privacy. Include policies, assessments, surveys, privacy officer listings, and background documentation required to show due diligence in county HIPAA compliance. Compliance records are maintained by Records Management & Archives.	Maintain as long as rule is in effect.	Exempt 45 CFR Parts 160, 162 & 164	Review for historical value. Approved by GRAMPA 06/18/2003	HP-003
Data Breach Notification Files	These records contain documentation of an agency's response to a data breach of PHI as required under the HITECH provisions. They may include notification letters, press releases, breach of health information forms, notification logs, HHS breach submission forms, and other documentation relating to the completion of the notification process. These records are maintained at the covered entity level (county agency).	6 years after completion of HHS notification	Exempt 45 CFR Parts 160 & 164	Approved by GRAMPA 01/27/2011	HP-008
Patient Medical Record Data	Covered component records containing Protected Health Information (PHI) that includes medical, psychological, mental health, client files information or other PHI as identified by the Privacy Rule.	6 years or longer if covered by another retention	Exempt 45 CFR Parts 160, 162 & 164	PHI as determined by Designated Record Sets in paper or electronic recordkeeping systems. Approved by GRAMPA 06/18/2003	HP-004
Security Documentation Files	Agency documentation, including security procedures, security officer designation, and any other documentation determined necessary by the agency to verify compliance with HIPAA security standards and safeguards. May be included as part of the Agency HIPAA Compliance Records.	6 years after creation of the record	Exempt 45 CFR Parts 160, 162 & 164	Approved by GRAMPA 03/17/2005	HP-007
Training Documentation Files	HIPAA training materials such as power point presentations, handouts, forms, and documentation of training including: sign in sheets, class rolls, signed training forms or other records of verification of training. **A copy of the training roster with the training title, date of training, length of training, and any other documentation must be sent to Personnel. (See Countywide policy #5550 section 6)	6 years	Exempt 45 CFR Parts 160, 162 & 164	Approved by GRAMPA 06/18/2003	HP-005
Use and Disclosure Records	These records document use and disclosure of Protected Health Information (PHI). May include authorization forms, request for disclosure, disclosure logs, forms and response letters, audit information and related records.	6 years	Exempt 45 CFR Parts 160, 162 & 164	PHI as determined by Designated Record Sets in paper or electronic recordkeeping systems. Approved by GRAMPA 06/18/2003	HP-006