



ADMINISTRATIVE PRACTICES MANUAL

Privacy Practices Audit Policy

PURPOSE

To establish controls and periodic reviews to monitor access, use, and disclosure of Protected Health Information (PHI).

PROCEDURE

Dane County performs internal audits to measure compliance with HIPAA regulations, policies and procedures. The audits will be conducted by the HIPAA Privacy & Security Officer. The types of audits should check for compliance with policies, practices and procedures such as:

1. Documentation of **Notice of Privacy Practices (NPP)** provided to client/patient at first point of contact;
2. Appropriate posting of **NPP**;
3. Incident/Breach procedures being followed;
4. Workforce member privacy training;
5. PHI access, use, and disclosure;
6. Secure e-mail messaging used when sending PHI;
7. Business Associate (BA) compliance with the Business Associate Agreement;
8. Information system activity, such as logs and access reports; or
9. Compliance with specific rules and areas that have been the focus of particular attention on the part of the federal Office for Civil Rights (OCR).

Following any audit that reveals compliance issues, Dane County will take corrective action to ensure future compliance with HIPAA regulations, policies, and procedures. Audits and any corrective action must be documented.

Audit Techniques

Audit techniques may include:

1. Workforce member interviews;
2. File reviews;
3. Questionnaires submitted to BAs;
4. Facility walk-throughs; and
5. Monitoring access and use of electronic records, and electronic systems.

DOCUMENTATION

Dane County will maintain the documentation associated with this policy for a minimum of seven years.

ROLES & RESPONSIBILITIES

The HIPAA Privacy & Security Officer is responsible for the implementation, maintenance, and adherence to this policy.

RELATED DOCUMENTS

Definitions

Notice of Privacy Practices

DOCUMENT VERSION HISTORY

Original: 08/2023

Reviewed: 09/2024