

HIPAA GAP ANALYSIS

Client Personal Health Information Flow

Intake Of New PHI From	CONFIDENTIALITY PROTECTION FOR PHI INTAKE	Documentation of PHI	CONFIDENTIALITY PROTECTION FOR PHI RECORDS	Storage of PHI	CONFIDENTIALITY PROTECTION FOR PHI RELEASE	Release of PHI To
<ol style="list-style-type: none"> 1. <u>Clients in home</u> Oral communication Phone communication Print / written documents 2. <u>Clients in clinic</u> Oral communication Phone communication Print / written documents Lab specimens 3. <u>Laboratory outside HD</u> Print / written documents 4. <u>Laboratory inside HD</u> Print / written documents 5. <u>HCP outside HD</u> Oral communication Phone communication Handwritten chart notes Electronic chart notes Completed forms 6. <u>HCP inside HD</u> Oral communication Phone communication Handwritten chart notes Electronic records / chart notes Completed forms Logs 7. <u>Schools</u> 8. <u>LHJ's / DOH</u> 9. <u>Hospitals</u> 10. <u>Employers</u> 11. <u>Members of the public</u> 12. <u>HD employees</u> 	<p>Aural and visual privacy</p> <p>Mail security</p> <p>Fax security</p> <p>Computer security</p>	<p>Handwritten chart notes</p> <p>Electronic records/ chart notes</p> <p>Reports or forms from outside sources filed w/ med record: Faxed documents E-mailed documents Mailed documents</p> <p>Transcribed chart notes</p> <p>Superbill</p> <p>Logs</p> <p>Forms</p> <p>X-rays</p>	<p>Medical records security</p> <p>Computer records security</p> <p>Transporting records security</p> <p>Internal document security (billing forms, lab forms)</p>	<p>Medical records (paper)</p> <p>Computer for electronic medical records (e.g., logs, PHIMS, Child Profile)</p> <p>WIC certification data (electronic)</p> <p>WIC certification data (paper)</p> <p>Logs</p> <p>Billing forms</p> <p>X-ray storage cabinets</p>	<p>Release of information consent forms</p> <p>Policy on release of information</p> <p>Policy to ensure protection of PHI confidentiality @ recipient site</p>	<p>Financial services</p> <p>Health care providers inside HD</p> <p>Health care providers outside HD</p> <p>State Dept. of Health</p> <p>Other LHJ's</p> <p>CPS</p> <p>Subpoenaed information</p> <p>Clients</p> <p>Family members of clients</p> <p>Third party payers</p> <p>Employers</p> <p>Schools</p> <p>Hospitals</p> <p>Others as determined by the HO due to PH risk</p>