

Compliance Newsletter

June 2019

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Compliance Hotline

Type:

http://157.21.29.163/Compliance/

and click on Hotline.

EVMS Medical Group Compliance concerns may also be sent to the EVMS Medical Group Compliance Office via phone, mail or e-mail. Minimum Necessary Standard

A key element of HIPAA and patient privacy is the minimum necessary standard which requires "covered entities to evaluate their practices and enhance safeguards as needed to limit unnecessary or inappropriate access to and disclosure of protected health information." (45 CFR 164.502(b), 164.514(d)) When releasing PHI, no more than what is required for the release should be disclosed and no information outside of the purpose of the release should be included. The standard is intended to be flexible while still providing ample protections for sensitive patient data.

The minimum necessary standard also applies to access. Access to PHI (Protected Health Information) on the EHR or any other electronic format should be limited to only that information which is needed to perform your job function. Viewing the record of someone you might know or someone you work with out of curiosity or for any other non-business reason is strictly prohibited and punishable not just by disciplinary action from EVMS Medical group but by law. As an employee, viewing your own medical record is also strictly prohibited as it falls outside of the scope of an employee's job function. Standard disciplinary action for accessing a chart that you would have had access to if you used the correct method (i.e. your own chart or someone's chart who has designated you to be involved in their care) is probation while accessing a chart that you would not have had access to otherwise can lead to termination.

For more information regarding the minimum necessary standard, please review the information at the link below:

HHS Guidance – Minimum Necessary

Signature Logs

Although most medical records are now generated

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Contact Us

EVMS Medical Group Compliance Office

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Link to Policies & Forms: http://www.evms.edu/patient_care/ compliance_program/

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Compliance "Listserv"

Send an email to browerl@evms.edu to request to be added to the EVMS Medical Group Compliance "Listserv". Once you are subscribed, you will receive newsletters, information and training opportunity announcements directly. electronically and maintained in the EHR, some paper documents are still used and scanned into the system. When a paper document is scanned, it is either manually signed prior to scanning by the provider of record or electronically signed once scanned into the EHR. Because these types of records still exist, signature logs are required to be maintained annually.

A signature log is a typed document containing the names, signatures, initials, and positions of any individuals within each department who may document in the patient's chart including faculty, residents, and staff members. Although the Compliance Office typically puts out a request for a copy of each department's updated log in July, these logs should be updated as needed when new faculty, residents, and staff join our organization. It is each department's responsibility to maintain an updated copy of the log and keep all previous logs indefinitely.

Signature Logs are important as they are used to authenticate or verify data that is contained in the medical record or sent outside of our organization. Because providers and staff come and go, it is important to keep the log updated through the year in case providers and staff are not with us when the Compliance Office asks for an annual copy in the Summer. This year's signature logs were due on Friday, July 26th. If you have not yet submitted copies please do so as soon as possible.

The requirement for Signature Logs can be found in CMS' MLN document on Medicare Signature Requirements:

Complying with Medicare Signature Requirements

e-PHI Security Tip

Good electronic record keeping helps to safeguard patient information and provides an audit trail for access to the record. Whenever possible document the reason for access if no actions were taken in the chart that are easily audited.

Lunch Discussion Session July

Topic: Best Practices for Protecting Patient Privacy

Who Should Attend: Anyone! This is a great session for managers as well as staff (or even providers). We will cover best practices at the front desk, in the exam room, and in all other areas of operations and take questions about how best to protect our patients' privacy in today's environment.

Date and Location:

Thursday, July 18th, 12-1:00 pm in HH 223

Please RSVP to Laura Brower at browerl@evms.edu or 451-6202 and feel free to bring your lunch!