Preparing For HIPAA Audits

Expert Offers Timely Tips
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Privacy and security specialist Phyllis Patrick offers practical tips on preparing for the upcoming federal HIPAA compliance audits.

One important HIPAA audit preparation step is to conduct an annual self-audit for compliance with the HIPAA privacy and security rules, Patrick says.

The Department of Health and Human Services' Office for Civil Rights plans to launch one or more pilots of HIPAA auditing methods later this year. It remains unclear when the formal HIPAA audit program, which was mandated under the HITECH Act, will begin. Nevertheless, Patrick stresses that healthcare organizations and their business associates should be preparing now.

In an interview following her presentation at the National HIPAA Summit, Patrick:

• Stresses that an annual self-audit should look at every aspect of HIPAA compliance, including: who has access to patient information, what physical security measures are in place and whether a comprehensive risk assessment needs updating.
• Advises organizations to make sure they have all necessary technical controls in place to support a comprehensive security program, and not just HIPAA compliance.
• Notes that organizations should make sure that all their HIPAA compliance steps are well-documented because auditors will ask for documentation.
• Suggests that those with limited budgets should at least conduct a narrow audit of records access, based on a sampling of users; implement encryption for high-risk devices, such as laptops; and make sure staff members are trained on privacy and security policies and procedures.

Patrick is president of Phyllis Patrick & Associates, which provides security, privacy and compliance advisory services to the health care industry.