

Subject:	Internal Review Policy: HIPAA-Reportable Incident
Effective Date:	April 8, 2020
Audience:	DHS
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Steps to take when alerted of an possible HIPAA Incident

Notify HIPAA Compliance Officer

- 1) Evaluate the situation
 - a. Ask questions to find out what happened and see if there is an actual incident
- 2) Check the process to see if it was followed.
- 3) See what steps caused the incident to occur.
- 4) See if training needs to occur or if the process needs to change.

Notify Necessary Parties

This is only done by HIPAA compliance officer

- 1) Contact legal counsel for LLTS.
- 2) Review situation and develop a plan
- 3) Notify parties involved.
- 4) Notify involved program if necessary.
 - a. I.E. grant or partnership.
- 5) If the incident turns into a reportable offense, notify Liability Ins.
- 6) Keep all documentation