**2014 HIPAA Risk Assessment**

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| **Risk Area:** | Patient request for restriction on PHI disclosed to health plans. |
| **Description:** | Under the HIPAA Omnibus Rule, a patient may request that a covered entity restrict the information that is provided to a health plan IF 3 conditions are satisfied:1. The patient specifically requests the restriction of PHI;
2. The patient has paid in full for the restricted services; and
3. The disclosure to the health plan would otherwise be permitted for payment or health care operations.
 |
| **No.** | **Workstep** | **Response** |
| Confidentiality |
| 1. |  |  |
| Integrity |
| 1. | Are technical safeguards in place to ensure that records are properly flagged as restricted from disclosure? |  |
| Accessibilty |
| 1. | Do current policies and procedures define how to receive, document and respond to requests for restrictions of PHI? |  |
| 2. | Have staff been trained on how to respond to requests for restrictions of PHI to health plans? |  |
| Scalability |
| 1. | Does the current medical record system have the capability to document requests for restrictions? |  |
| 2. | Does the current medical record system have the capability to restrict information disclosed to health plans for payment or health care operations? |  |
| 3. | If not, what steps are in place to comply with this requirement? |  |