

LOUISIANA HEALTH CARE QUALITY FORUM

POLICY: Accountability Principle in the Privacy and Security Framework	EFFECTIVE: 10-01-2011
DEPARTMENT: LHCQF/LaHIE	REVISED:

PURPOSE

To ensure a process is implemented, and adherences assured, through appropriate monitoring and other means and methods to report and mitigate non-adherence and breaches.

PROCESS

1. Participating organizations as the covered entities that exchange protected health information (PHI) to and through LaHIE will comply with the HIPAA Privacy Rule administrative requirements and extend such obligations to LHCQF/LaHIE as a business associate.
2. Participating organizations as the covered entities are responsible for their own non-compliance with the HIPAA Privacy Rule, as well as that of their workforce.
3. LHCQF/LaHIE, through its business associate agreement with the participating organization, will be contractually obligated to adequately safeguard the PHI and to report noncompliance with the agreement terms to the participating organization/covered entity, and the covered entity will be held accountable for taking appropriate action to cure known noncompliance by LHCQF/LaHIE, the business associate, and if unable to do so, to terminate the business associate relationship.
4. LHCQF/LaHIE may provide satisfactory assurances as part of its business associate agreement that adequately safeguard PHI. These may include:
 - a. LaHIE will not use or disclose PHI except as allowed by the agreement
 - b. LaHIE will implement reasonable and appropriate safeguards for PHI
 - c. LaHIE will report any uses or disclosures of PHI that violate the agreement of the participant/covered entity.

APPROVAL:

Cindy Munn
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