

**Practice Management Nugget ©
Webinar Learning Guide
Prevent Big Fines (or Worse!) for Your Healthcare Practice –
Learn How to Plan a Privacy Impact Assessment**

December 3, 2015 30 minutes

Presented by Jean L. Eaton (*Your Practice Management Mentor*)
INFORMATION MANAGERS LTD
jean@informationmanagers.ca
Connect with [LinkedIn](http://www.linkedin.com/in/jeaneaton) <http://www.linkedin.com/in/jeaneaton>
Follow us on [Twitter](#) @InfoManLtd
Follow #practicemanagementnugget with other participants

A Privacy Impact Assessment (PIA) **is the administrative practice of documenting your already-in-use office practices**, and it is a learning opportunity for you to rethink how you conduct your business. **A PIA provides the opportunity to think about every detail of your work from a privacy perspective.**

A PIA should be as common place to a healthcare practice as a business plan is to a business. BUT most healthcare practices don't know this and often don't know that a PIA is usually part of their professional college requirements and often even a legislated requirement! Prevent malicious errors, omissions, or attacks that could result in fines and even jail time for the business, healthcare provider, employee, or vendor by completing a PIA.

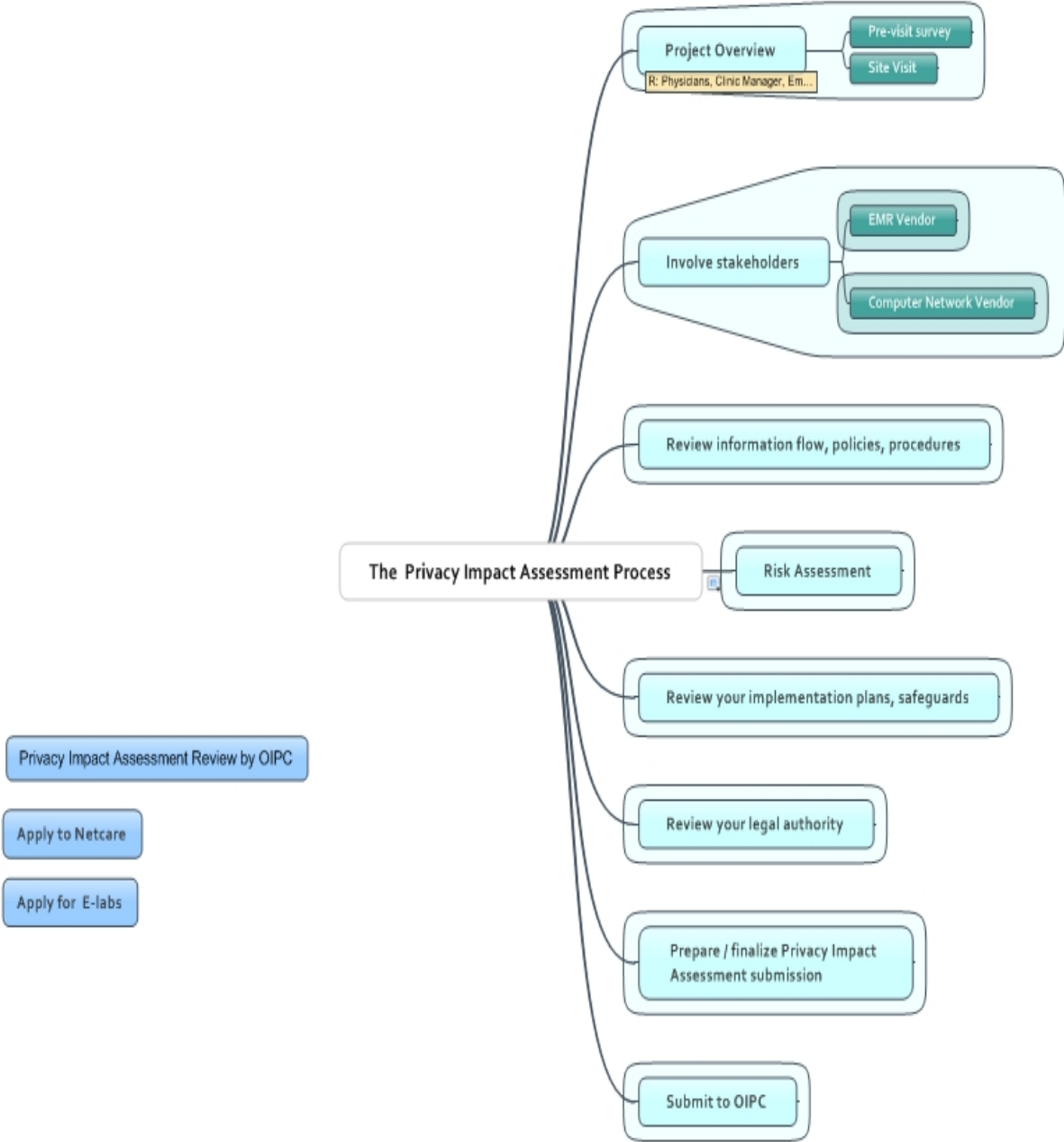
You need a Privacy Impact Assessment when:

- You are opening a new clinic or establishing a new health services program.
- You are changing administrative procedures or technology equipment, services, or vendors.
- You are changing how you collect and use personal information.
- You are implementing or changing an Electronic Medical Records (EMR).
- You are sharing health information with another healthcare provider, organization, Primary Care Network or other health program.
- You have a Privacy Impact Assessment that was written more than 2 years ago? (It is time to review and update this!)

Steps in a Privacy Impact Assessment are:

- Step 1 – Project Description
- Step 2 – Policies and Procedures
- Step 3 – Personal Health Information Flow
- Step 4 - Risk Analysis
- Step 5 – Legal Authority

Mind Map – PIA Process



PIA Timeline Worksheet – Sample

Steps	Details	Estimated Elapsed Time	Stakeholders / Participants	Documents	Status	Start	End
Step 1 – Project Description	5 W's & H - who, what, where, when, why, how						
Step 1 – Project Description	Organization Structure (short version)						
Step 1 – Project Description	Identify stakeholders						
Step 1 – Project Description	Plan meeting with ALL users, stakeholders, providers to contribute to the project description; discussion and agreement to the scope of the project and details. Consider drafting a high-level information flow diagram as the project illustration.						
Step 1 – Project Description	Gather documents that support each part of the organization structure						
Step 2 – Policies and Procedures	Gather documents that support the collection, use, and disclosure of personal health information						
Step 2 – Policies and Procedures	Gather documents that support the privacy, confidentiality, and security of personal health information						
Step 2 – Policies and Procedures	Identify what policies are missing and prepare these						
Step 2 – Policies and Procedures	Review and sign-off within your practice						
Step 3 – Personal Health Information Flow	Using pen and paper, start to illustrate each collection, use and disclosure of personal health information within your organization						
Step 3 – Personal Health Information Flow	- illustrate hand-offs or sharing of personal health information with other organizations (lab, registries, insurance, etc.)						
Step 3 – Personal Health Information Flow	- illustrate hand-offs or sharing of personal health information with other vendors and technology support (computer network backup, email, EMR, billing submitters, payroll, accounting, etc.)						
Step 3 – Personal Health Information Flow	Feedback / review within your practice and stakeholders						
Step 3 – Personal Health Information Flow	Improve (if necessary) illustration to information flow diagram; uniquely number each flow						
Step 3 – Personal Health Information Flow	Feedback / review and sign-off within your practice						
Step 4 - Risk Analysis	Using information flow diagram as a starting point, document how each information flow protects confidentiality, security, and privacy of personal health information						
Step 4 - Risk Analysis	Consider administrative, technical, and physical safeguards for each mitigation strategy						
Step 4 - Risk Analysis	Feedback / review within your practice and stakeholders						
Step 4 - Risk Analysis	Feedback / review and sign-off within your practice						
Step 5 – Legal Authority	Identify which legislation authorizes you to collect, use, and disclose personal health information for your project						
Step 5 – Legal Authority	Using the information flow diagram, cite the specific section of legislation that authorizes the collection, use and disclosure						
Step 5 – Legal Authority	Feedback / review and sign-off within your practice						
	Finalize submission package						
	Review and sign-off within your practice						
	Submission to regulator (OIPC as example) when required						

Part of *Practice Management Nugget*® webinar series

Webinar Learning Guide

Prevent Big Fines (or Worse!) for Your Healthcare Practice – Learn How to Plan a Privacy Impact Assessment

© INFORMATION MANAGERS LTD.

Page 3 of 4

Reference, Resources, and Links

Information Managers, [Document Management Tip: What is a Privacy Impact Assessment?](#)

Office of the Information and Privacy Commissioner. *Privacy Impact Assessment Requirements*. 2010. Retrieved June 2013 from

http://www.oipc.ab.ca/Content_Files/Files/PIAs/PIA_Requirements_2010.pdf

Popa, Claudiu. "The Canadian Privacy and Data Security Toolkit for Small and Medium Enterprises", Chartered Accountants of Canada, 2009

Protect Your Practice, Your Assets, and Your Patients with Privacy Impact Assessments – A Complete Step-by-Step Course

- If you are a healthcare provider, practice manager, and you need your first Privacy Impact Assessment, or
- **If your** Privacy Impact Assessment was written more than 2 years ago, **or**
- If you a vendor that supports healthcare practices

this e-course is for you! [See more information here](#)

Practice Management Nuggets© weekly interview series with practice managers, healthcare providers, or trusted vendors who support healthcare practices. Topics include things you need to know to help you start, grow, fix, or maintain your healthcare practice. Hosted by Jean Eaton, Your Practice Management Mentor. See <http://www.informationmanagers.ca/privacy-training> for upcoming events.