

Give Your Forms and Manuals a Checkup

By Laurie Hyland Robertson

With a bachelors degree in accounting, an MBA in finance, and 22 years in the healthcare field, consultant Jerrie K. Weith has helped plenty of practices over their startup hurdles. She frequently finds herself conducting operational assessments, too, for physicians who miss small but critical regulatory steps.

“Do you have an OSHA manual? Are your HIPAA forms compliant?” she asks. All too often they’re not, “and usually it’s the same thing. With HIPAA, for instance, they have to show that the release-of-information consent can be revoked by the patient. Each authorization is only valid for 90 days, unless the patient elects to revoke it before that period is up. Ninety percent of the time that statement isn’t there.”

Another common misstep? Practices confuse acknowledgment of the privacy policy with the privacy policy itself. “I’ll ask a practice for a copy of their intake form, and on it there’s a statement saying, ‘I have read and acknowledge receipt of the practice’s privacy policy.’ So then I ask for a copy of the privacy policy, and they tell me I have it,” says Weith. “You get swept up in seeing patients and miss stuff like that.”

Understandable, sure, but not a position in which you want to find yourself should a data breach or accident happen. Go straight to a reputable source for HIPAA-related questions — the Department of Health and Human Services (try www.hhs.gov/hipaafaq/) or CMS’s Web site. PhysiciansPractice.com has several articles on the subject, and the American Academy of Family Physicians maintains a database of good HIPAA information as well.

“You could buy a manual,” says Weith, “But remember that just because you bought the book, that doesn’t mean you’ve complied.” Practices often skip the step of going through the exercises in it, and fail to customize policies to be effective in their own settings.

“You can’t just buy the book and put your name on it,” Weith points out. “And I see that a lot.” With OSHA rules, for example: “I’ll ask a practice where their eyewash station is, and they’ll say, ‘I don’t know — where is it?’ That’s the only downside I see to buying those prepackaged manuals — it’s easy to leave it on the shelf. And then you have a needle stick in your practice and there’s no protocol, nobody knows what to do — because you never read the book.”