

## SHIPM – Change Log - June 2016

Section	Page	Change
All sections		<ul style="list-style-type: none"> <li>Updated all references to Chapter 1 (mainly in V. Related Policies) to correct policy name from “Authority” to “CalOHII Authority”</li> <li>Updated all references to Chapter 2 to correct policy name from “Personal (Patient) Representatives” to “Patient’s (Personal) Representative”</li> <li>Updated all references to Chapter 2 to correct policy name from “Required by Law” to “Required by Law and Required Disclosures”</li> <li>Updated all Policy header boxes to include Review Date and Revision Date. The review date will be used to indicate when the policy has been reviewed while the revision date will indicate when the policy was updated.</li> </ul> <p><b>Note</b> – for this update of the SHIPM, all revision dates (except for new policies) have been updated to indicate global changes as well as specific changes below.</p>
Topic Format		Included explanation of how policy references are formatted for Section V. Related Policies
2.1.1 Authorizations	17	Added CFR citation 45 CFR §164.530(i)(1) to II. Policy
	17	Corrected CFR citation for III.C to remove extra “)”
	17-18	Moved CFR citation from under III.D.2.d to III.D.1 where it applies and corrected the citation to remove extra “)”
	17-18	Added specific citations for each of the items under III.D.2
	18	Updated numbering to eliminate duplicate #5 – all items renumbered after first #5
	19	Added CFR citation §45 CFR 164.508(c)(2)(ii) to III.D.10.
	19	Moved CFR citation from under III.D.11 to III.D because it covers all items under III.D
	19	Added text “Note related to D.11 above...” following D.11
	19	Corrected CFR reference to remove erroneous “)” on III.F
2.2.3 Fundraising	26	Updated/Corrected CFR citation noted in III. Implementation and IV. References from 164.508(a) to 164.514(f)
2.2.4 Health Oversight	27, 28, 29	Added new CA Health and Safety Code 1797.122 citation to II. Policy, III.C and IV. References

## SHIPM – Change Log - June 2016

Section	Page	Change
	29	Updated V. Related Policies to reference the correct Chapter for Verification of Identity policy
2.2.8 Opportunity to Agree or Object	42	Updated various policy names in V. Related Policies
2.2.10 Public Health Activities	46	Updated policy reference in III.E to correct Chapter number from 5 to 2 for the Minimum Necessary policy
2.2.11 Required by Law and Required Disclosures	48	Updated policy reference in III.B to correct Chapter number from 4 to 3 for the Verification of Identity policy
	50	Removed erroneous reference to “Verification of Identity” from Chapter 2 – Law Enforcement citation in V. Related Policies
2.2.12 Research	51	Updated SHIPM policy name references for De-Identification in items III.B and C
	52	Updated Chapter (from 6 to 5) and policy name (removed Patient Rights) reference for SHIPM reference in item III.D
	52	Removed individual policy references for Chapter 2 since one referenced all policies in this chapter. Additionally, updated Chapter 5 policy names
2.2.18 – Hybrid Entities	68 - 70	New policy
2.3.4 Substance Abuse Treatment	81	Updated Chapter from 5 to 2 for Authorizations reference in III.B
2.3.5 Developmental Services Records	88, 89	Updated Chapter from 3 to 2 for Judicial and Administrative Proceedings policy reference in III.C.7.b and III.C.7.c
	91	Updated policy names in V. Related Policies
2.3.6 Psychotherapy Notes	93	Updated Chapter 3 to 2 for Victims of Abuse, Neglect or Domestic Violence policy reference in III.A.2.d.i
2.4.1 Breach and Breach Notification	96, 98	Removed “patient” from last sentence in III.D.1 and III.G – regarding notification
	98	Updated III.F to comply with new legislation regarding breach notification content/format – per SB570 and updates to Civil Code 1798.29
	98	Removed reference to California Department of Health Care Services from III.G.1 (previously b.)
2.6.1 Incidental Disclosures	106	Updated Chapter from 3 to 4 in V. Related Policies for Policy and Procedures
2.8.1 Patient’s (Personal) Representative	110	Updated Chapter from 3 to 2 for Victims of Abuse, Neglect or Domestic Violence policy in III.C.1
	111	Corrected policy reference in V. Related Policies for Verification of Identity
2.9.1 Requirements for Telehealth	112	Updated language in III.B to indicate policy and procedures are REQUIRED due to the unique nature

## SHIPM – Change Log - June 2016

Section	Page	Change
		of the environment
	112	Updated III.B.2 to ensure telehealth is considered during risk analysis
3.1.1 Contingency Plans	117	Updated citation reference in III.A.1 - correcting “0” to “)”
3.1.3 Information Access Management	121	Updated II. Policy to correct missing “,” in first paragraph and add “of” to second paragraph
3.1.4 Risk Analysis (now Security Management Process)	124	Updated policy name from Risk Analysis to Security Management Process to reflect full scope of policy – policy name references changed throughout document
	124	Updated II. Policy to add CA Government Code section 11549.3
	125	Updated III.A.6 Chapter reference from 5 to 4 for Sanctions of Violation policy
	125	Removed citation reference on III.C
	124, 126	Updated attachment checkbox and VI. Attachments to include new Risk Analysis/Assessment Checklist
3.1.7 Verification of Identity	132	Corrected III.B.1 from “identify” to “identity”
3.2.1 Access Control	138, 139	Updated CA SAM references to correct ending citation from 5399 to 5365.3 in III. Implementation Specifics and IV. References
3.2.2 Device and Media Controls	140	Updated incorrect reference from “Integrity” to “physical security” in III. Implementation Specifics
	140	Updated CA SAM references to correct ending citation from 5399 to 5365.3 in III. Implementation Specifics and IV. References
3.2.4 Workstation Use and Security	143	Corrected CFR citations references in III.C.3 and 4 from 160.312(a)(2)(iv) to 164.312(a)(2)(iv)
3.3.1 Audit Controls	145	Updated CA SAM references to correct ending citation from 5399 to 5365.3 in III. Implementation Specifics and IV. References
3.4.1 Documentation	151, 155	Corrected the policy title box and IV. Attachments to remove references to attachment – this policy does not have any attachments
	152	Updated table introduction to clarify table contents – adding the word “standards” to end of the sentence
	152, 153	Updated table headers to indicate SAM Chapter rather than section
	152, 153	Updated table to align “R” and “A” references to their specific line items
	153	Updated Encryption and Decryption item in table to add the word “including” to (data at rest) in the first item under Technical Safeguards

## SHIPM – Change Log - June 2016

Section	Page	Change
4.1.1 Policies and Procedures	157, 159	Updated attachment checkbox and VI. Attachments to include new HIPAA Required Policies and Procedures Checklist
	159	Updated V. Related Policies chapter reference for Policies and Procedures from 3 to 4 as well as updated Chapter 4 Staffing to include full policy name
4.1.3 Sanctions and Violations	163	Updated III.B to correct reference to policy for Victims of Abuse, Neglect or Domestic Violence from Chapter 3 to 2
4.1.4 Staffing: Privacy Official, Security Official	165	Updated Policy title from Officer to Official to be consistent with CFR reference
	165 – 168	Updated III. Implementation Specifics to include recommended job duties for Privacy Official and Security Official
	166	Updated III.A.2 reference to Notice of Privacy Practice policy from Chapter 6 to 5
	168	Updated III.B to include CalOHII recommendation regarding staffing of Privacy Official and Security Official
4.1.5 Trading Partner Agreements	169	Added III.B to recommend that all trading partner agreements include or reference a Companion Guide
4.3.1 Transactions and Code Sets	178	Updated III.A.3.a to remove outdated ICD-9-CM references
	178	Added III.E to recommend that all trading partner agreements include a Companion Guide
4.4.1 Business Associates	180	Updated III.A to include statement “This includes information about any restrictions for the use or disclosure of information as requested by the patient.”
	181	Removed incorrect citation from III.D.2.d.ii
	182	Added item III.D.6 to ensure ongoing communications between the Covered Entity and Business Associates regarding changes by patient
	182	Updated III.D.9 to include security incidents (along with breaches)
	182	Added item III.D.14 to ensure BAA include the conditions for termination of the BAA by the covered entity
	182	Updated citations for III.D to be inclusive of all 45 CFR 164.504(e)(1) and (2)
	N/A	Removed III.E – oversight by state entity is now covered in the new policy 4.4.2 – Oversight of Business Associates
	183	Added reference to Chapter 5 - Restrictions for Self-Pay and Confidential Communications to V. Related Policies

## SHIPM – Change Log - June 2016

Section	Page	Change
4.4.2 Oversight of Business Associates	184	New policy
4.6.2 Health Care Clearinghouses	191	Updated III.C to correct policy reference from Chapter 5 to 4
5.1.1 Accounting of Disclosures	200	Updated III.B.2 to add Special Note regarding subsequent patient requests for Account of Disclosures
5.4.1 Patient Rights – Access	210	Added clarification regarding patient access to health information for organizations with or without designated record sets
	211	Updated III.A.1.c to add “and an authorization” to the end of the item
	211	Updated III.A.1.d to clarify requirement for designated record set
	215, 217	Removed WIC citation from III.B.3.a and IV. References
	216	Corrected citation references in III.D.1.b and III.D.2
	216	Updated III.D.3 to correct policy reference from Chapter 2 to 3
	218	Updated V. Related Policies to correct policy reference from Chapter 2 to 3 for Verification of Identity
5.5.1 Restriction for Self-Pay and Confidential Communications	221	Added Chapter 4 – Business Associates reference to V. Related Policies
SHIPM Definitions	226	Updated definition of <b>Encryption</b> per updated CA Civil Code 1798.82
	232	Updated definition for <b>Implementation</b> to add the requirement for training all workforce members on policies and procedures
Attachments	N/A	Authorization for Release of Information (Template) <ul style="list-style-type: none"> <li>- Updated general formatting for consistency</li> <li>- Changed “Class of Person” to “Position or Role”</li> <li>- Corrected citation references under “Information Provided” and “Description of the Use and Limitations...”</li> </ul>
	N/A	B – Notice of Privacy Practices – Checklist <ul style="list-style-type: none"> <li>- Converted into checklist table format</li> </ul>
	N/A	D – Notice of Privacy Practices FAQ <ul style="list-style-type: none"> <li>- Updated citations in Group Health Plans and Revised Notice</li> <li>- Updated information regarding Notice Format to refer reader to CalOHII template</li> <li>- General formatting updates</li> </ul>

## SHIPM – Change Log - June 2016

Section	Page	Change
	N/A	Risk Analysis/Assessment Checklist - New checklist, attachment for 3.1.4 Security Management Process
	N/A	HIPAA Required Policies and Procedures Checklist - New checklist, attachment for 4.1.1 Policies and Procedures
	6 of 8	Business Associate Template - Added a new item (D) – regarding confidential communications - to “3. Obligations of...”