

Plan for HIPAA Privacy Compliance – April 14, 2003 Deadline

Activity To Be Completed		Date/Goal	Completed
To Be Done By February 15			
1.	Learn about the HIPAA administrative and privacy standards		
2.	Appoint the Privacy Official		
3.	Conduct an assessment of the pharmacy		
4.	Identify Business Associates and find existing contracts		
5.	Visit with software vendors about HIPAA compliance		
To Be Done By February 28			
6.	Prepare written policies and procedures		
7.	Prepare draft of the Notice of Privacy Practices		
8.	Prepare draft of the forms necessary to carry out standards		
9.	Determine if new Business Associate contracts are needed		
10.	Discuss testing of prescription processing with vendor		
To Be Done By March 15			
11.	Finalize policies and procedures and inform staff		
12.	Finalize the Notice of Privacy Practices and set format		
13.	Determine how staff training will be done		
14.	Prepare Business Associate contracts where needed		
To Be Done By March 31			
15.	Test policies and procedures		
16.	Begin staff training		
17.	Finalize Business Associate contracts		
18.	Vendor assurance that testing of software has begun		
To Be Done By April 13			
19.	Verify that all forms and documents are ready		
20.	Verify that all staff training has been completed		
21.	Verify that needed Business Associate contracts are finalized		
To Be Done On April 14			
22.	Distribute NPPs and get acknowledgement		
23.	Monitor effectiveness of process		
After April 14 up to October 16, 2003			
24.	Update all Business Associate contracts		
25.	Insure that transactions and code standards are met		
26.	Work on Security requirements		