

Worksheet for The Health Information Protection Act (HIPA) Privacy Impact Assessment

I. Definition of personal health information & authorization to collect, use, and disclose

Question	Yes	No
Is personal health information being collected?		

Notes:

Question	Yes	No
What personal health information is being collected?	N/A	N/A

Notes:

Question	Yes	No
Is the organization recognized as a "trustee" that is authorized to collect, use, and disclose personal health information?		

Notes:

II. Individuals right to be informed

Question	Yes	No
Will individuals be informed as to the anticipated uses and/or disclosures of personal health information?		

Notes:

Question	Yes	No
Are means and methods established to inform individuals of the access and privacy rights that they have regarding their personal health information?		

Notes:

Question	Yes	No
Are policies and procedures in place that allow the trustee to inform an individual when that individual's personal health information has been disclosed without consent?		

Notes:

III. Access of Individuals to Personal Health Information for Amendment and Review

Question	Yes	No
Are there procedures in place to enable an individual to request/review a copy of their personal health information?		

Notes:

Question	Yes	No
Are there procedures in place to amend an individual's personal health information, if requested?		

Notes:

Question	Yes	No
If amendments to personal health information are made, are there policies and procedures in place to inform other trustees or parties that have been the recipients of personal health information of the amendments that have been made?		

Notes:

Question	Yes	No
Are there policies and procedures in place to ensure that personal information is as accurate and complete as possible?		

Notes:

Question	Yes	No
Are policies and procedures in place to accommodate individual requests for access to personal health information?		

Notes:

Question	Yes	No
Are there resources available to respond and assist an individual's request for access to personal health information?		

Notes:

Question	Yes	No
Are there policies and procedures in place to, when appropriate, deny an individual request for access to personal health information?		

Notes:

IV. Protection of Personal Health Information

Question	Yes	No
Do policies and procedures exist to ensure that personal health information is properly protected?		

Notes:

Question	Yes	No
Are policies and procedures in place that allow for the retention and retrieval of personal health information?		

Notes:

Question	Yes	No
Are policies and procedures in place to govern the destruction of records that contain personal health information?		

Notes:

Question	Yes	No
In the case of personal health information being handled by an "information management service provider, are there policies, procedures, and/or agreements in place to ensure that the information management service provider properly cares for personal health information that they have been entrusted with?		

Notes:

V. Consent for collection, use and disclosure of personal health information

Question	Yes	No
Will the individual receive enough information to properly consent to the collection, use and disclosure of their personal health information?		

Notes:

Question	Yes	No
Are procedures and processes in place to accommodate an individual's revocation of consent for the collection, use, and disclosure of personal information?		

Notes:

Question	Yes	No
Is explicit consent required to disclose personal health information? Or can disclosure be authorized by "deemed" consent?		

Notes:

Question	Yes	No
If explicit consent is not required to disclose personal health information, will the disclosure be made in compliance with the prescribed circumstances where consent is not required?		

Notes:

VI. Limits on Collection, Use, and Disclosure

Question	Yes	No
Is the least amount of personal health information being <i>collected</i> to satisfy the purpose for which the information is needed?		

Notes:

Question	Yes	No
Is the least amount of personal health information being <i>disclosed</i> to satisfy the purpose for which the information is requested?		

Notes:

Question	Yes	No
Are policies and procedures in place that ensure only the appropriate employees have access to personal health information?		

Notes:

Question	Yes	No
Is the primary purpose for collecting personal health information that of providing a program, activity, or service that will be of benefit to the subject individual?		

Notes:

Question	Yes	No
In the situation(s) where personal health information is NOT collected directly from the individual, is it collected in a manner allowed by legislation?		

Notes:

Question	Yes	No
Is personal health information being used for its originally prescribed purpose or a purpose permitted by legislation?		

Notes:

VII. Disclosure for Research Purposes

Question	Yes	No
Will personal health information be used for research purposes?		

Notes:

Question	Yes	No
Are appropriate policies and procedures in place to allow for research that requires the consent of individuals to obtain personal health information?		

Notes:

Question	Yes	No
Are appropriate policies and procedures in place to allow for research where it is not practical to obtain consent from individuals?		

Notes: