Health Information Compliance Alert

SANCTIONS TOOL: PUT YOUR SANCTIONS SAVVY TO THE TEST

Don't wait for a violation to test your ability to effectively use your sanctions policy to mitigate the fallout of a privacy or security breach.

Try your hand at the following scenarios, created by **Frank Ruelas**, compliance officer with Gila River Health Care Corporation in Sacaton, AZ. For each situation listed below, determine how much damage the action could cause for both your organization and your patients, then figure out what category you'd stick it in and how you'd mitigate the damage it might cause.

1. A coworker who is out of the office calls in and asks someone to log in for them to check e-mail.

2. A patient's letter is returned and the recipient indicates that the addressee is no longer at the address. The letter has been opened.

3. Someone leaves an original page from a patient's medical record on the copier after making copies.

4. A workforce member forgets to secure the filing cabinet before leaving for the day.

5. A coworker asks another coworker in another department to review a draft of a letter to a patient to see if the letter is clearly written.

6. A disk containing patient encounter data is lost.

7. Patients with similar names have their files mixed up and before the error is identified, disclosures have been made.