

## Health Information Compliance Alert

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Question: I've read about privacy impact assessments and am considering whether we should take the time to formally conduct one on our new EHR system. What exactly is a PIA, how is it different from a privacy audit and what are the benefits of conducting one?

Answer: A privacy impact assessment (PIA) is a risk mitigation tool that helps you prevent problems before they occur, whereas audits serve more of a retrospective function. Such an assessment enables you to evaluate whether a new system or procedure will meet compliance standards and helps ensure a good ROI by offering a systematic way to identify and remove any inherent risks.

It's vital to start a PIA as early as possible -- ideally in the project initiation phase -- to recognize any major issues embedded in a new system's design before you implement it, stressed **Erik Pupo**, practice manager at Project Performance Corporation in McLean, Va., at the Healthcare Information and Management Systems Society (HIMSS) annual conference in Chicago.

Goals: A thorough PIA has several beneficial outcomes; it provides a framework for documenting the collection, use, disclosure and destruction of personally identifiable information, enhances internal and external accountability for privacy compliance, and reduces the number of IT revisions and retrofitting you'll face, said Kristen Knight, director of privacy compliance for Phillips Healthcare in Andover, Mass., at the HIMSS conference.

PIA ingredients: After finishing the assessment you will have a clearer idea of how the new system uses and retains data; its access and security features; and your policies for internal and external sharing and disclosure, giving notice to patients, and providing a means for individuals to access and correct their information.

Resource: Access a PIA whitepaper entitled "Managing Information Privacy & Security in Healthcare: Privacy Impact Assessment Guide" at

[www.himss.org/content/files/CPRIToolkit/version6/v6%20pdf/D87\\_HIMSS\\_PIA\\_Guide\\_FinalV2.pdf](http://www.himss.org/content/files/CPRIToolkit/version6/v6%20pdf/D87_HIMSS_PIA_Guide_FinalV2.pdf).

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