

From: [Raines, Jill \(HSC\)](#)
To:

Subject: Lost Paper Records
Date: Tuesday, January 10, 2017 3:54:28 PM

Good Afternoon, HCC Contacts and HCC Business Managers -

Today, OCR announced its first settlement of the new year. The settlement is in response to lost paper-based patient schedules. OCR has focused on protecting electronic PHI, such as by encrypting portable devices, but this settlement is a good reminder that we must continue to protect documents that contain PHI as well.

Please remind your workforce members that they are individually responsible for protecting the PHI that they carry in their pockets, folders, briefcases, and the like, and remind them not to remove PHI from your area solely for their convenience. Our policy requires that paper PHI be secured when it will not be attended, such as by being placed in a locked cabinet, and that it be properly destroyed via cross-cut shredder or recycled by an approved vendor when it is no longer needed.

Thank you for your assistance in ensuring our patients' information is protected.

Healthcare network Presence Health recently agreed to a **\$475,000 OCR HIPAA settlement** following a reported data breach and a subsequent delayed breach notification process.

Presence submitted a breach notification report to OCR on January 31, 2014, stemming from an incident on October 22, 2013. The health network discovered that **paper-based operating room schedules containing the PHI of 836 individuals were missing** from the Presence Surgery Center at the Presence St. Joseph Medical Center in Joliet, Illinois.

This is the **first OCR HIPAA settlement announced for 2017**. Last year, **risk analysis was a key focus area**, with OCR maintaining the importance of healthcare organizations conducting regular and comprehensive risk analyses. Having proper business associates that are regularly updated were also listed as top areas for covered entities.

Jill Bush Raines

Assistant General Counsel, Office of Legal Counsel
and University Privacy Official

The University of Oklahoma

1105 N. Stonewall Avenue, Suite 221

Oklahoma City, OK 73117-1221

(405) 271-2033

(405) 271-1076 (fax)

jill-raines@ouhsc.edu

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