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Compliance Hotline

Type:

<http://157.21.29.163/Compliance/>
and click on Hotline.

EVMS Medical Group Compliance concerns may also be sent to the EVMS Medical Group Compliance Office via phone, mail or e-mail.

Annual Compliance Survey Results

This year's Compliance Survey was distributed on October 4, 2016 and remained open until January 13, 2017. The survey link was sent to the Practice Management Committee as well as the Compliance "listserv" and managers were asked to distribute to their faculty and staff. The link was also posted in the October and November Compliance Newsletters. There were 151 total respondents this year which unfortunately is a decrease from the 195 individuals who took the survey last year.

Compared to last year's results there was a slight increase in the percentage of individuals who know where to find our Compliance and Privacy policies and forms. There was a slight decrease in the percentage of respondents who would feel comfortable discussing Compliance related concerns with their direct supervisor. For those who stated they would not feel comfortable, free text responses included some concerning statements including that the respondent did not know who their direct supervisor was, that their concerns would not be listened to, as well as fear of possible retaliation including loss of job. The percent of individuals who are aware of how to report a concern to the Compliance Office increased slightly from last year. The percent of respondents who felt that they could report issues without fear of retaliation was unchanged from last year's results. When asked if a compliance or privacy violation had ever been observed in their workplace, the percent of respondents who stated that they had nearly doubled although slightly less claimed to have reported the incident. There was a 10% increase in the percentage of individuals who receive the Compliance Newsletter and a 16% increase in the number of respondents who have attended a Compliance Lunch Discussion. Other comments and requests included more off campus opportunities, the chance to have different departments lead discussions, as well as some great points about privacy vulnerabilities on campus.

As always, the information gathered is very helpful in

Contact Us

EVMS Medical Group Compliance Office

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Suite 500
Norfolk, VA 23508
Phone 451-6200

Link to Policies & Forms:

http://www.evms.edu/patient_care/compliance_program/

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Compliance "Listserv"

Send an email to browerl@evms.edu to request to be added to the EVMS Medical Group Compliance "Listserv". Once you are subscribed, you will receive newsletters, information and training opportunity announcements directly.

identifying focus areas and potential topics on which to improve within the Compliance Program. This year's data will be benchmarked against past year's results. Many thanks to all who took the time to participate as the survey helps set the tone for training, education, and policy formation for the remainder of the fiscal year and beyond.

Vendors and Business Associate Agreements

It is often helpful and in many cases necessary to utilize outside vendors to facilitate the provision of services to our patients. HIPAA allows us to send patient information to such outside vendors provided that certain policies and procedures are in place to safeguard patient data. HIPAA describes these entities as Business Associates, and defines them as "a person or entity that performs certain functions or activities that involve the use or disclosure of protected health information on behalf of, or provides services to, a covered entity." (45 CFR 160.103) EVMS Medical Group is the "covered entity" in this definition and any outside vendors or individuals that use or disclose our PHI are our Business Associates. For example, our electronic health record vendor, Allscripts, is a Business Associate of EVMS Medical Group.

Before we share information with any such outside entity, a "Business Associate Agreement" or BAA, must be on file. All BAAs must be executed by our CEO, Mr. James Lind, as he is the only individual with signatory authority for our organization. Departments and divisions should periodically review where and to whom their patient data is being used and/or transmitted and ensure that a BAA is on file with that entity if necessary. Any questions may be directed to the Compliance Office and the full policy on Business Associates can be located at the link below:

[EVMS Medical Group Business Associate Policy](#)

e-PHI Security Tip

When using any electronic system that grants access to PHI (Citrix, IDX, Allscripts, etc.) you should always be using your own login information that is specific to you. Sharing of login information is prohibited and could lead to an impermissible disclosure of PHI. If you are ever asked to use another staff member's login or login for someone else, it should be reported to the Compliance Office immediately.

Lunch Discussion Session February

Topic: Annual Compliance Training

Who Should Attend: Anyone who has not yet satisfied their annual training requirement (this applies to almost everyone with the exception of new employees who received training at Orientation as well as a few select departments). The end of the fiscal year will be here before we know it and this is a great opportunity for smaller departments who wish to send a few employees at a time rather than holding a department-wide session. **Please note that this is SEPARATE from the EVMS Blackboard training that is required by the school.**

Date and Location:

Thursday, February 16th, 12-1:00 pm in HH 757

Please RSVP to Laura Brower at browerl@evms.edu or 451-6202 and feel free to bring your lunch!