

HIPAA Compliance Procedure

Use this template to data handling for [system/process] with PHI rules and breach reporting.

Template Metadata

Field	Details
Category	Healthcare
Owner	[Team or owner]
Version	[Version number]
Effective Date	[Date]
Review Cycle	[Monthly / Quarterly / Annual / Event-based]
Status	[Draft / In Review / Approved]

Purpose & Regulatory Basis

Cite applicable HIPAA rules (Privacy Rule, Security Rule, Breach Notification Rule) and the system or process covered.

Item	Details	Owner	Status
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]

Notes

[Add context, assumptions, exceptions, evidence links, screenshots, calculations, or reviewer comments.]

PHI Definition & Scope

Define Protected Health Information in the context of this procedure. List the 18 HIPAA identifiers relevant to the system. Specify what data elements are present.

Item	Details	Owner	Status
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]

Notes

[Add context, assumptions, exceptions, evidence links, screenshots, calculations, or reviewer comments.]

Access Control

Role-based access levels table showing each role, data access scope, and authentication requirements. Include provisioning and de-provisioning procedures.

Item	Details	Owner	Status
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]

Notes

[Add context, assumptions, exceptions, evidence links, screenshots, calculations, or reviewer comments.]

Minimum Necessary Standard

How the minimum necessary standard is enforced for this system, with examples for each user role.

Item	Details	Owner	Status
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]

Notes

[Add context, assumptions, exceptions, evidence links, screenshots, calculations, or reviewer comments.]

Audit & Monitoring

Audit log requirements, log retention period, review frequency, and automated alerting for suspicious access patterns.

Item	Details	Owner	Status
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]

Notes

[Add context, assumptions, exceptions, evidence links, screenshots, calculations, or reviewer comments.]

Breach Identification & Reporting

Breach risk assessment methodology, notification timelines (60-day rule for individuals, immediate for HHS), and breach response team contacts.

Item	Details	Owner	Status
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]

Notes

[Add context, assumptions, exceptions, evidence links, screenshots, calculations, or reviewer comments.]

Workforce Training

Required HIPAA training topics, frequency, documentation, and new hire onboarding timeline.

Item	Details	Owner	Status
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]

Notes

[Add context, assumptions, exceptions, evidence links, screenshots, calculations, or reviewer comments.]

Sanctions

Sanctions for non-compliance aligned with organizational policy. Use tables for access levels and audit requirements. Reference specific CFR sections.

Item	Details	Owner	Status
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]

Item	Details	Owner	Status
[Item or requirement]	[Describe the relevant detail, evidence, or decision]	[Owner]	[Open / Complete]

Notes

[Add context, assumptions, exceptions, evidence links, screenshots, calculations, or reviewer comments.]

Review and Signoff

Document review conclusions, approvals, unresolved items, and next review date.

Role	Name	Date	Notes
Preparer	[Name]	[Date]	[Notes]
Reviewer	[Name]	[Date]	[Notes]
Approver	[Name]	[Date]	[Notes]