

Table of Contents

Introduction	5
Purpose of This Document	5
Design Considerations	5
Breach Events	5
How to Use This Document	6
Terminology.....	7
Policy Template	7
Procedure Templates	8
Written Procedure Templates	8
Forms Templates.....	9
Customizing Procedures, Forms and Logs	9
Ensuring the Customized Procedures Work.....	10
Policy Template	12
Policy.....	12
Explanations of Title Block Headings.....	17
Explanations of Content Headings.....	17
Procedure Template	19
Title Block	19
Table of Contents	19
Purpose	22
Scope	22
Roles and Functions Performed	22
Resources Used:.....	24
Evidence Produced.....	25
Top-Level Procedure - Receive and Respond to Presumed HIPAA Breach Report	26
Text Version.....	26
Flow Version.....	27
Reviews	28
Enforcement.....	28
Responsibilities	28
Related Policies.....	28
Related Plans and Procedures	28
Regulatory References	28
Maintenance Log.....	29

Procedure Details	30
1. Receive Report of Presumed Breach.....	30
2. Prepare Report of Presumed Breach	31
3. Assess Presumed Breach Report.....	32
3.1. Ensure Presumed Breach Information is Complete and Accurate.....	33
3.2. Confirm Breach.....	35
3.2.1. Perform Risk Assessment	38
4. Take Corrective Action	40
5. Notify Other Involved Parties.....	42
6. Notify Affected Covered Entities.....	43
7. Notify Affected Business Associates (for Subcontractors)	45
Forms	48
Information about Forms	48
Breach Reporting Form, Part A: Presumed Breach Data Collection	50
Breach Reporting Form, Part B: Exclusion Test	54
Breach Reporting Form, Part C: Risk Assessment	56
Breach Reporting Form, Part D: Recommendations and Approval.....	60
Breach Reporting Form Part E: Draft Notice to Secretary.....	62
Breach Reporting Form, Part F: Corrective Actions Taken	66
Logs	67
Information about Logs	67
Receipt of Presumed Breach Report Log	68
Covered Entity Notification Report Log.....	69
Business Associate Notification Report Log (for subcontractors)	70
Supplemental Flow Charts	71
1. Receive Report of Presumed Breach.....	72
2. Prepare Report of Presumed Breach	73
3. Assess Presumed Breach Report.....	74
3.1. Ensure Presumed Breach Information Is Complete and Accurate.....	75
3.2.1. Perform Risk Assessment	76
3.2. Confirm Breach.....	77
4. Take Corrective Action	78
5. Notify Other Involved Parties.....	79
6. Notify Affected Covered Entities.....	80
7. Notify Affected Business Associates (for Subcontractors)	81
About Flow Templates	82
How to Use Flow Templates	82

Flow Symbols	83
License	86
Support	86