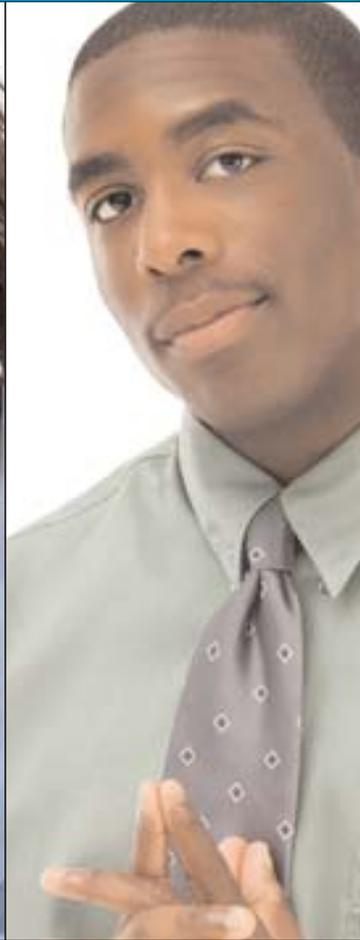


PROMOTING A CULTURE OF PRIVACY
THROUGH PARTNERSHIPS



**PRIVACY
COMPLIANCE
ASSURANCE**



**Veterans Health
Administration**

**Office of Health Information
Health Data and Informatics**

INFORMATION ACCESS AND PRIVACY

Assessments

What to expect

- Pre-assessment contact to establish logistics and request documents (e.g., policies)
- In-brief meeting with facility leadership to set visit expectations
- Interviews with facility subject matter experts
- A physical evaluation of the facility operations that impact Privacy, FOIA, Research and Records Management
- On-the-spot training to correct non-compliant business activities
- Final observations to leadership

How to prepare

Before and during the assessment:

Your site staff will work with the PCA team and should be willing to provide a true and accurate picture of the facility's Privacy, FOIA, and Records Management programs in order to get the most from the assessment process.

After the assessment:

- The facility is expected to strategically address deficiencies, focusing first on critical, high-risk areas
 - All deficiencies should be remediated within 90 days of the assessment unless otherwise indicated by PCA
 - PCA provides continued telephone follow-up and documentation of completion of remediation activities
-



Who are we?

The VHA Privacy Compliance Assurance (PCA) team has extensive field-based experience in the areas of:

- **Privacy**
- Freedom of Information Act (**FOIA**)
- **Research**-related privacy requirements
- **Records Management**

PCA conducts assessments to ensure each health care facility maintains compliance in these areas. Often PCA does these assessments with, or adjunct to, those conducted by other oversight organizations such as VA's Office of IT Oversight and Compliance (ITOC), the Office of Research Oversight (ORO), and the System-wide Ongoing Assessment and Review Strategy (SOARS).

How can we help you?

During the privacy-assessment process, PCA provides facilities with feedback on performance, as well as support and guidance on how to remediate their weaknesses. PCA also offers assistance and resources (both on-site and remotely) to enhance Privacy, FOIA, Research, and Records Management programs.

In addition to joint-assessments with other oversight organizations, PCA conducts three types of visits to assess facilities and provide advice.

How do we connect with you? Three types of visits

1. PCA Assessment

- Review privacy in all areas across the facility including: Research, Release of Information, FOIA, Human Resources, etc.
- Provide an objective review of a facility's overall Privacy, FOIA, Research and Records Management programs
- Identify risk areas to help facilities avoid a privacy breach or non-compliance
- Provide recommendations for remediating deficiencies

2. Follow-up Assessment (FUA)

- Review progress after an assessment (e.g., PCA, ITOC, ORO, SOARS)
- Validate facility remediation efforts
- FUA results in a visit report that:
 - Monitors and acknowledges progress since previous assessments
 - Prioritizes efforts to remediate high-risk areas
 - Identifies best practices
 - Identifies additional non-compliance and provides further recommendations

3. Remediation Assistance Visit (RAV)

PCA provides facilities with remediation assistance based on needs identified during assessments including:

- Crisis Management/Training for urgent and emergent issues. This is roll-up-your-sleeves, boots-on-the-ground remediation support for an area identified as extremely high risk.
- Strategic Planning to develop a methodical plan for remediation. PCA works with your facility to frame and prioritize remediation efforts.
- Telephone Remediation contacts to determine facility remediation progress. Site-specific guidance is provided to help your facility improve.



Resources and Contacts

For detailed up-to-date resources and information, visit our intranet sites:

Privacy Compliance Assurance

<http://vaww.vhaco.va.gov/privacy/PCA.htm>

VHA Office of Information Access and Privacy

<http://vaww.vhaco.va.gov/privacy/>

VA Privacy

<http://vaww.privacy.va.gov/>

VHA Office of Health Information Management

<http://vaww.vhaco.va.gov/him/>

VHA Office of Health Data and Informatics

<http://vaww.vhaco.va.gov/HDI/>

VHA Office of Health Information

<http://vaww.va.gov/vhanoi/>

Internet site:

http://www1.va.gov/vha_oi/

PRIVACY COMPLIANCE ASSURANCE

