

May 15 2019 Regular Meeting

May 15 2019 Regular Meeting - May 15 2019 Regular Meeting

District Board Agenda, May 15 2019 Regular Meeting

District Board Agenda, May 15 2019 Regular Meeting	2
--	---

NIHD Auxiliary Hours of Service Report

NIHD Auxiliary Hours of Service Report, May 2019.....	5
---	---

Chief of Staff Report, May 2019

Medical Executive Committee report, May 2019.....	6
---	---

Financial and Statistical Reports

Financial and Statistical Reports	7
---	---

Capital Budget Overview

Capital Budget Overview (May 2019).....	12
---	----

Compliance Department Quarterly Report

Compliance Department Quarterly report, May 2019	14
--	----

Consent Agenda, May 15 2019 Regular Meeting

Minutes, April 17 2019 Regular Meeting	27
--	----

Policy and Procedure Annual Approvals, May 2019	31
---	----

AGENDA
NORTHERN INYO HEALTHCARE DISTRICT
BOARD OF DIRECTORS REGULAR MEETING
May 15, 2019 at 5:30 p.m.
2957 Birch Street, Bishop, CA

1. Call to Order (at 5:30 pm).
2. At this time persons in the audience may speak on any items not on the agenda on any matter within the jurisdiction of the District Board (*Members of the audience will have an opportunity to address the Board on every item on the agenda. Speakers are limited to a maximum of three minutes each*).
3. Adjournment to closed session to:
 - A. Conference with Labor Negotiators; Agency Designated Representative: Irma Moisa;
Employee Organization: AFSCME Council 57 (*pursuant to Government Code Section 54957.6*).
4. Return to open session (at 6:15 pm) and report of any action taken.
5. NIHD Auxiliary hours of service report (*information item*).
6. Strategic Plan update, Patient Experience Committee report (*information item*).
7. Chief of Staff Report; Allison Robinson MD:
 - A. Policy and Procedure approvals (*action items*):
 1. *Athena Designated Field Documentation*
 2. *Standards of Care in the Perioperative Unit*
 3. *Malignant Hyperthermia*
 4. *Recommendation for Patients Identified at Risk for TACO*
 5. *Opioid Sedation Scale*
 - B. Medical Staff Appointments (*action items*):
 1. Monika Mehrens, DO (*family medicine/hospitalist*) – Locums/Temporary Staff
 2. Tamara McBride, MD (*family medicine/hospitalist*) – Locums/Temporary staff
 3. Earl Landrito, MD (*radiology*) – Provisional Consulting Staff
 - C. Telemedicine Staff Appointments – credentialing by proxy (*action items*):
 1. Tanya Scurry, MD (*psychiatry*) – Adventist Health (St. Helena)
 2. Arrash Fard, MD (*cardiology*) – Adventist Health (Simi Valley)
 - D. Additional Privileges (*action item*):

1. Anne Wakamiya, MD (*internal medicine*) – addition of inpatient core privileges
- E. Resignations (*action items*):
 1. Doris Lin, MD (*Family Practice/Emergency Medicine*) – effective March 23, 2019
 2. Keith Shonnard, MD (*Radiology – Tahoe Carson Radiology Group*) – effective March 28, 2019
 3. Navid Ezra, MD (*Dermatology*) – effective March 20, 2019
 4. Talha Khawar, MD (*Rheumatology*) – effective March 1, 2019
8. New Business
 - A. Chief Executive Officer report (*information item*).
 - B. SHIP Grant renewal (*information item*).
 - C. Joint Commission Corrective Action Plan submission (*information item*).
 - D. Chief Operating Officer report (*information item*).
 - E. Joint Commission Laboratory survey (*information item*).
 - F. Chief Nursing Officer report (*information item*).
 - G. Chief Financial Officer report (*information item*).
 - H. Financial and Statistical Reports (*action item*).
 - I. Capital Budget overview, fiscal year 2019/2020 (*action item*).
 - J. Compliance Officer Quarterly report (*action item*).
9. Old Business
 - A. Determination of date for next Strategic Planning session (*discussion item*).

Consent Agenda (action items)

10. Approval of minutes of the April 17 2019 regular meeting
 11. Policy and Procedure annual approvals
-
12. Reports from Board members (*information items*).
 13. Adjournment to closed session to/for:
 - A. Discuss trade secrets, new programs and services (estimated public session date for discussion yet to be determined) (*Health and Safety Code Section 32106*).
 - B. Conference with Legal Counsel regarding anticipated litigation or significant exposure to litigation (pursuant to Government Code Section 54956.9(b)), 1 potential case.

- C. Conduct Public employee performance evaluation, Chief Executive Officer (*pursuant to Government Code Section 54957*).
- 14. Return to open session and report of any action taken in closed session.
- 15. Adjournment.

In compliance with the Americans with Disabilities Act, if you require special accommodations to participate in a District Board meeting, please contact administration at (760) 873-2838 at least 48 hours prior to the meeting.

NORTHERN INYO HOSPITAL AUXILIARY
AWARDS LUNCHEON

May 8, 2019

100 Hours

Darla Cummings

Pat Flanagan

Vicky Spear

1000 Hours

Betty Buckle

June Shaw

1500 Hours

Jacque Johnston

2500 Hours

Betty Dickey

Cheryl Underhill

Total Hours 2019=11,990

Total Hours 1982-2019= 215,406

3000 Hours

Diane Remick

3500 Hours

Vivian Mitchel

Shirley Stone

7500 Hours

Judy Fratella

11,500 Hours

Nona Jones

16,366 Hours

Sharon Moore

Total Hours more than 2018

3,937



NORTHERN INYO HOSPITAL
Northern Inyo Healthcare District
150 Pioneer Lane, Bishop, California 93514

Medical Staff Office
(760) 873-2136 voice
(760) 873-2130 fax

TO: NIHD Board of Directors
FROM: Allison Robinson, MD, Chief of Medical Staff
DATE: May 7, 2019
RE: Medical Executive Committee Report

The Medical Executive Committee met on this date. Following careful review and consideration, the Committee agreed to recommend the following to the NIHD Board of Directors:

A. Policies and Procedures (*action items*)

1. *Athena Designated Field Documentation*
2. *Standards of Care in the Perioperative Unit*
3. *Malignant Hyperthermia*
4. *Recommendation for Patients Identified at Risk for TACO*
5. *Opioid Sedation Scale.*

B. Medical Staff Appointments (*action items*)

1. Monika Mehrens, DO (*family medicine/hospitalist*) – Locums/Temporary staff
2. Tamara McBride, MD (*family medicine/hospitalist*) – Locums/Temporary staff
3. Earl Landrito, MD (*radiology*) – Provisional Consulting Staff

C. Telemedicine Staff Appointments – credentialing by proxy (*action items*)

1. Tanya Scurry, MD (*psychiatry*) – Adventist Health (St. Helena)
2. Arrash Fard, MD (*cardiology*) – Adventist Health (Simi Valley)

D. Additional Privileges (*action item*)

1. Anne Wakamiya, MD (*internal medicine*) – addition of inpatient core privileges.

E. Resignations (*action items*)

1. Doris Lin, MD (*Family Practice/Emergency Medicine*) – effective March 23, 2019
2. Keith Shonnard, MD (*Radiology – Tahoe Carson Radiology Group*) – effective March 28, 2019
3. Navid Ezra, MD (*Dermatology*) – effective March 20, 2019
4. Talha Khawar, MD (*Rheumatology*) – effective March 1, 2019

Northern Inyo Healthcare District
Income Statement - Detail
As of February 28, 2019

	Month To Date 02/28/2019 <small>Actual</small>	Month To Date 01/31/2019 <small>Actual</small>	Year To Date 02/28/2019 <small>Actual</small>	Year To Date 02/28/2018 <small>Actual</small>
patient Revenue	2,044,116.57	2,652,242.06	24,282,492.24	29,124,338.38
outpatient Revenue	9,159,140.97	10,520,788.12	73,898,256.97	68,798,607.24
ambulatory Clinic Revenue	604,111.75	536,037.81	2,324,468.08	0.00
Total Gross Patient Service Revenue	11,807,369.29	13,709,067.99	100,505,217.29	97,922,945.62
deductions from Revenue	(6,062,764.24)	(7,840,983.86)	(51,657,535.90)	(45,183,736.40)
other Patient Revenue	(9.00)	(9.59)	(18.59)	0.00
Total Net Patient Revenue	5,744,596.05	5,868,074.54	48,847,662.80	52,739,209.22
Income/Expense from Cost Reporting				
Medicare Settlement Income/Expense	329,140.00	329,140.00	1,316,560.00	0.00
Disproportionate Share Income/Loss	0.00	0.00	2,471,501.66	2,286,469.57
Total Income/Expense from Cost Reporting	329,140.00	329,140.00	3,788,061.66	2,286,469.57
Other Operating Revenue	968,749.19	992,915.15	6,815,581.39	273,810.35
Operating Expenses				
Repairs and Maintenance	15,085.37	13,437.22	325,450.02	1,267,951.96
Leases and Rental Expenses	77,567.05	80,116.79	574,895.30	642,117.98
Salary & Wages	2,362,626.62	2,461,170.67	20,371,638.18	16,898,316.53
Benefits	1,616,718.75	1,927,653.64	13,707,720.82	12,561,392.52
Non-Benefit Expenses	7,189.81	15,162.71	111,681.56	134,710.53
Professional Fees	551,408.22	689,488.98	7,276,942.79	8,180,003.48
Supplies	699,343.19	472,413.76	5,632,459.52	5,732,617.61
Contract Services	601,739.65	508,112.16	3,616,402.78	1,168,230.44
Other Department Expenses	104,005.45	90,572.48	688,342.13	571,108.11
Hospital Insurance Expenses	33,686.99	(24,535.01)	281,805.91	238,155.34
Utilities	116,151.71	122,150.94	1,040,329.45	895,778.78
Depreciation and Amortization	314,692.81	314,697.67	2,681,778.12	3,270,484.01
Other Fees	289,955.27	(61,953.61)	954,013.86	810,554.89
Interest Expense - Operating	231,986.23	231,952.23	1,873,835.85	1,990,891.82
Total Operating Expenses	7,022,157.12	6,840,440.63	59,137,296.29	54,362,314.00
unspecified Department Expenses	0.00	0.00	0.00	(1,218,762.75)
Total Net Operating Profit (Loss)	20,328.12	349,689.06	314,009.56	2,155,937.89
Non-Operating Revenue				
Other Income				
Tax Payer General Support	48,743.07	48,743.07	389,944.56	350,678.47
Bond/ Tax Payer Bond Support	137,595.79	137,595.79	991,838.47	1,029,174.00
Investment Income	0.00	0.00	20.28	0.00
Interpreter Services Revenue	0.00	0.00	17,826.52	0.00
Fin Chgs-Pt Ar - Int Incm-Jdgmnt	0.00	0.00	287.31	264.33
Fin Chgs-Pt Ar - Int Incm-Payors	0.00	5,435.16	14,205.89	45,049.74
Interest Income	54,595.50	75,712.39	465,113.64	193,058.30
Total Other Income	240,934.36	267,486.41	1,879,236.67	1,618,224.84
Grant Revenue	0.00	0.00	2,035,715.72	1,529,931.72
Other Non-Operating Income	2,576.00	16,236.00	38,440.00	15,039.61
Net Medical Office Activity	(467,856.37)	(497,895.07)	(4,411,434.83)	(2,892,616.57)
340b Net Activity	40,608.32	38,684.91	195,637.83	(3,250.81)
Donations	3,000.00	0.00	6,300.00	0.00
Rental Income	0.00	0.00	15,994.70	36,961.32
Gain - Investments - Other Income	0.00	0.00	5,080.50	0.00

**Northern Inyo Healthcare District
Income Statement - Detail
As of February 28, 2019**

	Month To Date 02/28/2019 <small>Actual</small>	Month To Date 01/31/2019 <small>Actual</small>	Year To Date 02/28/2019 <small>Actual</small>	Year To Date 02/28/2018 <small>Actual</small>
Total Non-Operating Revenue	(180,737.69)	(175,487.75)	(235,029.41)	304,290.11
Total Net Non-Operating Profit	(180,737.69)	(175,487.75)	(235,029.41)	304,290.11
Total Net Income	(160,409.57)	174,201.31	78,980.15	2,460,228.00

Northern Inyo Healthcare District
 Balance Sheet
 As of February 28, 2019
 Month Ending 02/28/2019

	Actual
Assets	
Current Assets	
Cash and Liquid Capital	(818,065.92)
Short Term Investments	14,507,104.93
PMA Partnership	379,758.00
Accounts Receivable, Net of Allowance	19,483,383.03
Other Receivables	6,357,372.63
Short Term Notes Receivable	(131.00)
Inventory	3,781,863.95
Prepaid Expenses	1,957,699.16
Total Current Assets	45,648,984.78
Assets Limited as to Use	
Internally Designated for Capital Acquisitions	1,098,765.26
Short Term - Restricted	1,585,470.45
Limited Use Assets	
DC Pension	2,403,826.63
DB Pension	13,547,735.00
PEPRA	2,967.70
Total Limited Use Assets	15,954,529.33
Revenue Bonds Held by a Trustee	4,061,505.23
Total Assets Limited as to Use	22,700,270.27
Long Term Assets	
Long Term Investment	1,054,166.52
Fixed Assets, Net of Depreciation	77,339,820.15
Total Long Term Assets	78,393,986.67
Total Assets	146,743,241.72
Liabilities	
Current Liabilities	
Current Maturities of Long-Term Debt	811,088.92
Accounts Payable	1,445,199.84
Accrued Payroll and Related	9,839,618.06
Accrued Interest and Sales Tax	529,493.36
Unearned Revenue	264,859.50
Due to 3rd Party Payors	1,239,097.96
Due to Specific Purpose Funds	108,883.52
Other Deferred Credits - Pension	4,059,539.70
Total Current Liabilities	18,297,780.86
Long Term Liabilities	
Long Term Debt	41,839,947.15
Bond Premium	499,361.72
Accreted Interest	13,078,069.00
Other Non-Current Liability - Pension	31,778,171.00
Total Long Term Liabilities	87,195,548.87
Suspense Liabilities	2,170,173.16
Total Liabilities	107,663,502.89
Fund Balance	
Fund Balance	37,634,677.95
Temporarily Restricted	1,605,470.45
Net Income	(160,409.57)
Total Fund Balance	39,079,738.83
Liabilities + Fund Balance	146,743,241.72

Northern Inyo Healthcare District
 Balance Sheet
 As of January 31, 2019
 Month Ending 01/31/2019

	Actual
Assets	
Current Assets	
Cash and Liquid Capital	3,982,339.06
Short Term Investments	10,760,730.00
PMA Partnership	379,758.00
Accounts Receivable, Net of Allowance	19,445,885.50
Other Receivables	6,058,639.08
Short Term Notes Receivable	(21.00)
Inventory	3,761,221.71
Prepaid Expenses	1,909,159.86
Total Current Assets	46,297,712.21
Assets Limited as to Use	
Internally Designated for Capital Acquisitions	1,098,765.26
Short Term - Restricted	1,585,470.45
Limited Use Assets	
DC Pension	2,290,201.56
DB Pension	13,547,735.00
PEPRA	2,967.70
Total Limited Use Assets	15,840,904.26
Revenue Bonds Held by a Trustee	3,898,772.53
Total Assets Limited as to Use	22,423,912.50
Long Term Assets	
Long Term Investment	1,054,166.52
Fixed Assets, Net of Depreciation	77,647,787.97
Total Long Term Assets	78,701,954.49
Total Assets	147,423,579.20
Liabilities	
Current Liabilities	
Current Maturities of Long-Term Debt	811,088.92
Accounts Payable	3,745,325.11
Accrued Payroll and Related	9,723,485.72
Accrued Interest and Sales Tax	410,404.03
Unearned Revenue	313,602.57
Due to 3rd Party Payors	1,239,094.96
Due to Specific Purpose Funds	108,883.52
Other Deferred Credits - Pension	4,059,539.70
Total Current Liabilities	20,411,424.53
Long Term Liabilities	
Long Term Debt	41,839,947.15
Bond Premium	503,753.23
Accreted Interest	12,967,520.25
Other Non-Current Liability - Pension	31,778,171.00
Total Long Term Liabilities	87,089,391.63
Suspense Liabilities	682,614.64
Total Liabilities	108,183,430.80
Fund Balance	
Fund Balance	37,460,476.64
Temporarily Restricted	1,605,470.45
Net Income	174,201.31
Total Fund Balance	39,240,148.40
Liabilities + Fund Balance	147,423,579.20

NORTHERN INYO HEALTHCARE DISTRICT

Investments as of February 28, 2019

Purchase Date	Maturity Date	Institution	Broker	Rate	Fair Market Value
27-Feb-19	01-Mar-19	Local Agency Investment Fund	Northern Inyo Hospital	2.39%	11,678,736.43
15-Jun-18	15-Mar-19	BK Phoenixville - FNC	Financial Northeast Corp.	2.20%	249,897.50
30-Nov-18	30-May-19	Homestreet BK Seattle Wash CTF	Financial Northeast Corp.	2.40%	149,923.50
02-Jul-14	02-Jul-19	Barclays Bank	Financial Northeast Corp.	2.05%	249,305.00
02-Jul-14	02-Jul-19	Goldman Sachs Bank USA NY CD	Financial Northeast Corp.	2.05%	249,242.50
		Short Term Investments			12,577,104.93
20-May-15	20-May-20	American Express Centurion Bank	Financial Northeast Corp.	2.05%	98,699.00
26-Sep-16	27-Sep-21	Comenity Capital Bank	Multi-Bank Service	1.70%	238,755.00
02-Sep-16	28-Sep-21	Capital One Bank	Multi-Bank Service	1.70%	238,825.00
28-Sep-16	28-Sep-21	Capital One National Assn	Multi-Bank Service	1.70%	238,825.00
28-Sep-16	28-Sep-21	Wells Fargo Bank NA	Multi-Bank Service	1.70%	239,062.50
		Long Term Investments		\$	1,054,166.50
		Total Investments		\$	13,631,271.43
28-Feb-19	01-Mar-19	LAIIF Defined Cont Plan	Northern Inyo Hospital	2.39%	2,403,826.63



**NORTHERN
INYO HOSPITAL**
Northern Inyo Healthcare District

150 Pioneer Lane
Bishop, California
93514
(760) 873-5811 voice
(760) 872-2768 fax

May 7, 2019

Board of Directors:

- ◆ **Mary Mae Kilpatrick,
President**
- ◆ **Jean Turner,
Vice President**
- ◆ **Robert Sharp,
Secretary**
- ◆ **Peter Tracy,
Treasurer**
- ◆ **M.C. Hubbard,
Member at Large**
- ◆ **Kevin S. Flanigan,
MD, MBA, CEO**

To: Governing Board of Northern Inyo Healthcare District
From: John Tremble, Chief Financial Officer
Subject: Recommended 2020 Capital Budget

The departments of the District have submitted nearly 50 Capital items with a cost of more than \$2,350,000 and additional requests pending. The Capital requests are in the process of being vetted for compatibility, resource capacity, OSPD requirements, and Medical Staff agreement with the recommendation.

In addition to the Capital requests, we have a number of requests which are repairs to Capital Assets who continue to have service life. These requests will also be vetted and included in the final 2020 Operational budget. Management may request a smaller than projected net income in order to complete these repairs.

The District is projected to end Fiscal 2019 with \$17,562,000 of cash and investments on hand; 76.3 days. During the next Fiscal year, the growth in net accounts receivable will be reversed and returned to normal levels. The reversal in growth in net accounts receivable will increase cash on hand by \$6,200,000. The cash flow budget for approval includes \$550,000 for other strategic investments along with expected changes in payables, long term debt and pension liability and an income of \$700,000 for the year.

The projected cash flow for 2020 is expected to result in a total days of cash on hand of 102.7 assuming operations consumes \$237,041 per day in expenditures. With the District's goal of maintaining 90 days cash on hand, the projected end of year cash balance of \$24,333,700 means the District could spend \$3,000,000 in Fiscal 2020 on Capital and be at or above our 90 day goal for cash and investments on hand.

The Statement of Cash Flow assumes all the Capital authorized for Fiscal 2019 has been purchased, installed and paid for as of June 30, 2019. The District will most likely have some Capital projects continuing into Fiscal 2020 from Fiscal 2019.

*Improving our
Communities One
Life at a Time. One
Team. One Goal.
Your Health!*

Web Site
www.nih.org

Northern Inyo Healthcare District
Statement of Cash Flow
For Fiscal Year 2018 & 2019 & 2020
Capital Budget Impact Statement

	FY 2017	FY 2018	FY 2019	FY 2020
Cash on Hand	18,616,934	16,058,324	19,488,837	17,562,114
Used for Other District Investments	(248,369)	133,052	(1,515,000)	(550,000)
Change in Net Patient A/R	(2,995,894)	(583,127)	(6,200,000)	6,200,000
Change in Other Receivables	501,536	(3,023,014)	3,000,000	-
Change in Inventory	(843,685)	(740,014)	(265,000)	40,000
Change in Prepaid Expenses	(315,821)	(627,014)	60,000	60,000
Change in Special Purpose Assets	(1,157,516)	(4,054)	-	-
Change in Revenue Bonds with Trustee	3,395,095	(25,587)	(45,308)	(45,000)
Change in Long Term Investments	(197,857)	202,378	-	-
Change in Net Property et al.	3,260,381	2,965,374	3,800,000	2,450,000
Change in current Liabilities	(3,810,215)	1,588,068	720,000	(360,000)
Change in long term debt	(2,048,220)	(807,054)	(2,168,000)	(2,450,000)
Accreted Interest change	1,326,585	1,326,585	1,326,585	1,326,585
Change in Pension liability	190,710	1,290,639	600,000	(600,000)
Change in Temporarily Restricted	1,157,516	30,376	-	-
Net Income (Loss)	(772,856)	1,703,905	(1,240,000)	700,000
Ending Cash on Hand	16,058,324	19,488,837	17,562,114	24,333,699
Total Operating Expenses plus Principal	74,465,243	78,565,420	84,000,000	86,520,000
Average Cash Used Per Day	204,014	215,248	230,137	237,041
Ending Days Cash on Hand	78.7	90.5	76.3	102.7
Organizational Goal		90.0	90.0	90.0
Minimum Floor			75.0	75.0
Available Additional for Capital with 90 days Cash on Hand:				\$ 3,000,000

Compliance Report May 2019

1. Comprehensive Compliance Program review
 - a. As of April 29, 2019, 93.2% District's employee (including temporary, traveler, and contract workers) workforce have reviewed the Compliance Program, most within 90 days of their first day of employment. This number fluctuates due to employee turnover. We have also experienced an issue with Policy Manager, leaving new employees with the program unassigned. We are correcting this issue.
2. Breaches
 - a. Calendar Year (CY) 2019 – (attachment A)
 - i. 22 alleged breaches of PHI (Protected Health Information) potentially affecting more than 25 patients have been investigated by the Compliance Office
 - ii. 2 of the alleged breaches of PHI have been reported to California Department of Public Health (CDPH) and/or the Office of Civil Rights (OCR)
 1. CDPH has completed investigation of 1 cases. One (1) breach was substantiated, but assigned no deficiency.
 2. One (1) case is still pending CDPH investigation. Several cases from prior years are still pending letters of findings, indicating that at least several are likely to incur some deficiency and potential penalty.
 - iii. 5 Potential breaches are currently under investigation by the NIHD Compliance Department.
3. Issues and Inquiries
 - a. CY 2019 – More than 115 requests for research and input on a wide variety of topics have been made to the Compliance Department.
 - i. Compliance and regulation research tops the list.
 - ii. Policy advice and research
 - iii. Potential compliance concerns that do not reach the level of a full investigation. (Usually require training and education)
 - b. Compliance currently reviews all new referring physicians to verify they are not on a Federal or State exclusions list. To date in 2019, Compliance has verified several

hundred providers. It is considered fraud to bill any government payer for diagnostic or treatment claims, if ordered by an excluded provider.

- i. Compliance has identified one referring provider on an exclusions list. We notified Administration, and properly addressed the issue.

4. Audits

- a. Employee Access Audits (attachment B) - The Compliance Office manually completes audits for access of patient information systems to ensure that employees access records only on a work-related, “need to know,” and “minimum necessary” basis.
 - i. The HIPAA and HITECH Acts imply that organizations must perform due diligence by actively auditing and monitoring for appropriate use of PHI. These audits are also required by the Joint Commission and are a component of the “Meaningful Use” requirements.
 - ii. Access audits monitor who is accessing records by audit trails created in the systems. These audits allow us to detect unusual or unauthorized access of patient medical records.
 - iii. Compliance performs between 300-500 audits monthly.
 1. Each audit ranges from hundreds of lines of data to hundreds of thousands of lines of data.
 - iv. Protenus has been selected to provide semi-automated auditing software services to NIHD beginning as soon as IT resources are able to be allocated for the project.
- b. Business Associates Agreements (BAA) audit
 - i. Contracts are currently under review to ensure all vendors, individuals, and entities providing services that access, disclose, retain, or transmit PHI for NIHD have an up-to-date Business Associates Agreement.
 - ii. We currently have around 140 Business Associates Agreements.
- c. PACS (Picture Archival and Communication System) User Access Agreements – Compliance is now processing access agreements for external entities/providers to gain access to the NIHD PACS Portal (electronic Imaging system).
- d. HIPAA Security Risk Assessment – Completed December 2019
 - i. Annual requirement to assess security and privacy risk areas as defined in 45 CFR 164.3. Review of 157 privacy and security elements performed in conjunction with Information Technology Services.

