



Important Reminders about HIPAA for APEX Surveyors

As you know, the Health Insurance Portability and Accountability Act of 1996, and amendments thereto and regulations promulgated thereunder (collectively, "HIPAA"), protects the confidentiality and security of protected health information (PHI). HIPAA applies to covered entities (including hospitals) and their business associates. In your role as an APEX Surveyor, please remember the following key points:

- ASTRO, as an accrediting body, is a business associate of each covered entity that applies for APEX accreditation. Therefore, ASTRO signs HIPAA Business Associate Agreements with each APEX covered entity applicant. These HIPAA Business Associate Agreements specify and limit how ASTRO, as a business associate, may use or disclose the covered entity applicant's PHI.
- You, as an APEX Surveyor, are subject to the requirements under HIPAA as a member of ASTRO's workforce. Additionally, as an APEX Surveyor, you are subject to ASTRO's HIPAA Privacy and Security Policies and Procedures.
- As an APEX Surveyor, you will be exposed to PHI during your facility visits. The information you view in certain patients' medical records within a facility's electronic health record system constitutes PHI and therefore is protected under HIPAA.
- You must not take any notes that include PHI.
- You must not download or copy any PHI.
- Importantly, the information contained on ASTRO's Medical Record Tracking Worksheet, which is the document that helps you keep track of the medical records you view during your facility visits, could be considered PHI. **You are not to remove this Medical Record Tracking Worksheet from the facility. Instead, you are to return this document to the facility's staff. If you find that you have accidentally taken the Medical Record Tracking Worksheet with you when you leave the facility, please securely shred it and contact ASTRO's Privacy Officer immediately at HIPAA@astro.org.**
- You have received more detailed information about your duties and obligations under HIPAA in the APEX HIPAA training session. Additional information about your role as an APEX Surveyor can be found in the APEX Surveyor Guide, ASTRO's HIPAA Policies and Procedures, and in the provisions of your Surveyor Agreement with ASTRO.
- If you have any questions related to the information contained herein (including what may constitute PHI and your duties under HIPAA as an APEX Surveyor), please contact ASTRO's Privacy Officer at HIPAA@astro.org.