

HIPAA Compliance

RC/PPS No. 01.13

Issued: January 2021

Revised Date: September 2024

Next Review Date: September 2026, (E2YRS)

Senior Reviewer:

01. PURPOSE

- 01.01 This Departmental Policy and Procedure Statement sets forth criteria and guidelines for HIPAA Compliance for the Ascension Seton Williamson (ASW) Sleep Center (ASWSC) at Texas State University in Department of Respiratory Care. The lease agreement with ASW is continually renewed according to the terms set forth in the agreement.

02. POLICY

- 02.01 Of special consideration, ASW completed Joint Commission reaccreditation include a site visit of the Sleep Center. A full three-year reaccreditation was granted by JCO. Also, all software was vetted by the Texas State University IT department and deemed acceptable of use as proposed in the Sleep Center.
- 02.02 Ongoing practices to assure HIPAA Compliance are as follows:
- a. The outside doors to Willow Hall are locked and secured after 5pm Monday through Friday and all weekend. Access to Willow Hall is badge Access only.
 - b. The doors entering the Sleep Center are locked and secured at all times Monday through Friday and access to the Sleep Center is badge Access only.
 - c. At the request of ASW, patient information is handled in the following manner: patient information via hard copy is hand-carried from ASW to the Sleep Center in an individual patient folder. The patient's folder includes an information face sheet, an individual armband, and patient labels.
 - d. The patient folder is hand-carried by the ASWMC Director of Respiratory Care and placed in a locked cabinet inside the Sleep Center staff control room. Only patient information for sleep studies scheduled for that day are delivered. Only sleep technicians and the Director of Respiratory Care at ASW have keys to the locked cabinets where patient information is delivered.
 - e. Only Sleep staff, faculty staff, sleep manager and sleep medical director have access to the sleep control room within the Sleep Center.
 - f. When staff arrive, patient folders are taken out of the locked cabinet for verifying patient information.
 - g. Sleep studies are conducted and stored in a third-party database system, Somnoware Database. Only sleep techs, sleep managers and sleep physicians have access to the sleep studies in the Somnoware database.
<https://www.somnoware.com>

- h. When a sleep study is completed, completed patient paperwork is placed back in the patient folder and placed back in the locked cabinet.
- i. Designated and approved physicians have access to Somnoware and completed sleep studies for physician interpretation. Once the physician completes the sleep study interpretation in Somnoware, the sleep study is downloaded and sent to HIM for submission into EMR
- j. Sleep Lab access is badge access only, only those clinicians and faculty that serve sleep patients have access.
- k. Patient's folder which includes (face sheet, armband, and patient labels) are brought over and placed into a locked cabinet inside the staff control room. Only those sleep studies scheduled for that day are brought over. Keys to the locked cabinet are located in the cabinet above. In progress - changing key lock to combination electronic lock.
- l. Sleep staff, faculty staff, sleep manager and sleep medical director have access to the sleep control room.
- m. When staff arrive, patient folders are taken out of the locked cabinet for verifying patient information.
- n. Sleep studies are conducted and stored in the Somnoware Program. Only sleep techs, faculty members, sleep managers, and sleep physicians have access to the sleep studies in Somnoware.
- o. When studies are completed, patient paperwork is placed back in the patient folder and placed back in the locked cabinet.
- p. The patient folder is retrieved the next morning by the sleep manager and taken back to SMCW for completion of the report.
- q. Once the physician interprets the sleep study through access to Somnoware, the sleep study is downloaded to a hardcopy sleep study interpretation and sent to HIM for submission into EMR with the hardcopy being shredded.
- r. The ASW Sleep Center at Texas State University is accredited through ASWMC as an ambulatory service with full accreditation.


03. MAJOR RESPONSIBILITIES ASSOCIATED WITH THIS RC/PPS


03.01 Major responsibilities for routine assignments associated with this PPS include the following:

- a. The Chair, the ASWMC Respiratory Therapy Manager and the Personnel Committee of the Department of Respiratory Care shall review this PPS E2Y.

04. CERTIFICATION STATEMENT

04.01 This RC/PPS has been approved by the following individuals in his/her official capacity and represents Department policy and procedures from the date of this document until superseded.

Reviewer:  Date: 10/30/2024
[Chris Russian \(Oct 30, 2024 08:42 CDT\)](#)
Personnel Committee Chair

Approved:  Date: 10/30/2024
Department Chair