

# COMPLIANCE CONNECTION

## LMS Training and Compliance

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Have you signed in to the LMS module lately? Do you see those email notices come through and think “I’ll do it later”... but “later” slips by?

If you’re in the middle of a project when those notices come through to your inbox, put a reminder on your calendar or add it to your task manager.



It’s an easy way to be reminded about your responsibility to complete your online training. When you sign in to the LMS system you will see the modules that are assigned to you. Take a few minutes today to sign in and check for your assignments. Annual Compliance training is a requirement. It’s important! <https://ctlms-dmhas.ct.gov>.

*Values are not exclusive to a particular policy. Values apply to all of our policies and are universal to everything we do.*

*“Alone we can do so little, together we can do so much.”*

*Helen Keller*

## COMPLIANCE HOTLINE—HELPFUL HINTS

Did you know the Compliance Department has several ways that you may report a concern or alleged wrong doing?

There is the Anonymous Hotline (877-277-9471), a Compliance Hotline (860-418-6991), a Privacy Hotline (860-418-6901) or you may submit a confidential email at [compliance.alertlink@ct.gov](mailto:compliance.alertlink@ct.gov).

### Who may file a complaint?

Anyone may file a complaint.

### Why file a complaint?

Because compliance is everyone’s job. Compliance is not achieved by only one person; it’s achieved when everyone does their part.

### What is a complaint?

A complaint is a written document or email or confidential call to the Hotline.

### Help us help you!

If you witness or have knowledge of alleged non-compliance please report it to the Hotline. Your complaint will be held confidential, and/or you may remain anonymous. If the complainant chooses to remain anonymous, we cannot obtain additional information on the allegation (e.g., testimonial or documentary evidence; identity of witnesses), and also cannot inform the complainant (you) as to what action has been taken on the complaint.

Confidential status allows further communication between the Chief Compliance Officer and the complainant after the original complaint is received. In order to investigate your concerns properly, please provide as much information as possible.

Here’s an idea of what we would ask that you provide so that we can fully investigate and inform you of the outcome.

Your information should include:

- Who committed the alleged wrongdoing
- What exactly did the individual or entity do (or NOT do)?
- Where and when did the alleged activity take place?
- How are the individuals involved and how were these individuals able to perform the alleged activity?

If you would like for us to get back to you, please provide your confidential contact information.



## NEWS YOU CAN USE...

### Careless handling of PHI jeopardizes patient privacy; costs entity

St. Luke's-Roosevelt Hospital Center Inc. (St. Luke's) has paid the U.S. Department of Health and Human Services (HHS) \$387,200 to settle potential violations of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule and agreed to implement a comprehensive corrective action plan. St. Luke's operates the Institute for Advanced Medicine, the Spencer Cox Center, which provides comprehensive health services to persons living with HIV or AIDS and other chronic diseases. St. Luke's is 1 of 7 hospitals that comprise the Mount Sinai Health System.

The patient subsequently sued for \$2.5 million for negligently

faxing a patient's HIV diagnosis to his employer's fax machine.



After the patient asked staff to mail a copy of his records to his post office box or his home, a faxed copy of his complete medical records was discovered by his coworkers, which led to the man quitting his job and losing his health insurance.

In another unrelated case a doctors office in Fort Worth area of Texas accidentally faxed PHI to the wrong number.

The fax was received by a local media outlet, WFAA, who immediately contacted the doctors office. In this case the number used by the physician office was identical to the WFAA number except for a SINGLE DIGIT.

*Don't be negligent—check your fax numbers and details of the Consent before hitting the “send” button!*



**“With Integrity  
you have  
nothing to fear,  
because you  
have nothing to  
hide.”**

Zig Ziglar

### BY THE NUMBERS...

**256 pages:**

A woman in Brooksville, Florida, requested her own medical records from Oak Hill Hospital but instead received 256 pages of records belonging to a stranger in Ohio, reports 10News WTSP

**87%**

Consumers are more willing to share their health data with an entity if they are confident in that entity's data security,

according to a survey. Most respondents are confident in physicians' data security (87%) and are willing to share health data with them (86%), while confidence and willingness to share is less for health insurance companies (60% and 58%, respectively), pharmacies (68% and 52%, respectively), and research

institutions (47% and 44%, respectively).

**\$5 Billion**

After a long privacy investigation, the U.S. Federal Trade Commission voted to levy a \$5 billion fine against Facebook, according to the Washington Post and the Wall Street Journal. The fine is the largest one ever levied by the FTC against a tech company

### REFERENCES

<https://www.hhs.gov>  
<https://hipaajournal>  
<https://fiercehealth>

### Chief Compliance

**Officer:**

**Elizabeth Taylor, OOC,  
860.418.6648**

*Do you have a topic of particular interest you would like to know more about? If so, please contact me (above) or send an email to [elizabeth.taylor@ct.gov](mailto:elizabeth.taylor@ct.gov)*

### Facility Compliance

**Officers:**

Christine Bouey, WFH  
 Ellen Brotherton, WCMHN  
 Joseph Conrad, CVH  
 Tracey Edwards, SMHA  
 Megan Goodfield, RVS  
 Ann Lenz CMHC  
 Mark Meola, Interim, CRMHC  
 Paula Zwally, SWCMHS

**To report anonymously:  
Toll free: 877.277.9471**

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Privacy Hotline: 860.418.6901**

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