

Right of Access & Release of Information Compliance

Online Training Program

Why train in Right of Access/Release of Information?

Many workforce members have direct or indirect interactions with patients, caregivers, family members, payers and/or law enforcement. This responsibility spans between providers, nurses, practice managers, compliance officers, front desk/intake staff, patient financial services, medical billing, filing appeals or responding to a payer audit, in addition to responding to authorizations requesting medical record information.

Workforce compliance to Federal and State privacy rules will help mitigate risk of a HIPAA breach and lower risk of a complaint filed to the Office of Civil Rights (OCR) triggering an investigation resulting in potential penalties, settlements or even criminal charges against your organization.



Online, On-Demand Training - This course is Online, On-Demand with no scheduled classes to attend during your 3-month access to course materials. You have 3-month access included in your tuition. Access your course information 24 hours a day, 7 days a week, by logging into the AIHC website. A qualified, certified instructor is available upon request to address questions you may have during your training experience.

Earn Continuing Education Units (CEUs)



12 CEUs - This program has been approved for 12 continuing education units by the American Institute of Healthcare Compliance for AIHC Certified Professionals. These continuing education units may be applied towards the HIPAA and Ethics categories for ALL credentialed members and Core for, CHA, CHCO, CHMSP, CIFHA, CMDP, COCAS, HPOC, and OHCC.

What You Will Learn

Introduction to Right of Access, Release of Information and HIPAA

- Introductory video, Terms, abbreviations and acronyms list

Artificial Intelligence (AI), Advancing Technologies and Protected Health Information

- Introduction to Artificial Intelligence, how AI is regulated, AI and Use with Protected Health Information (PHI), AI and HIPAA Privacy Concerns

Introduction to Information Blocking

- Patient rights, the 21st Century Cures Act & Practices Constituting Information Blocking
- Enforcement & Penalties, Exceptions

Right of Access & the Privacy Rule

- Patient's right to Access, the Designated Record Set
- Requirements of a Timely Response to Request for Records
- Notice of Privacy Practices (NOPP) & When Authorization is Needed
- Authorization versus Right of Access
- Comparing Right of Access Requirements to Violations Related to Information Blocking



OCR and the Right of Access Initiative

- Notable OCR Determinations and Corrective Actions Taken
- Information Included in the Right of Access
- Denial of Access, Grounds for Denial

Providing Access to Patient Information

- Disclosure versus Use of PHI
- State Versus Federal HIPAA Privacy Rules
- Guidelines for timeliness to release information – State versus Federal Rules
- Obtaining Authorization
- Access Right, the Privacy Rule and Charging Fees for Copies of PHI
- Identify Potential Red Flags

Releasing Information to Personal Representatives

- Authority under State Law
- Guardian Ad Litem, Define an individual's personal representative per 45 CFR 164.502(g) and 45 CFR 164.524, When the Individual (Patient) Appoints a Personal Representative (Stands in the Shoes)
- Health care Power of Attorney (HPOA)
- Parents and Unemancipated Minors

Releasing Information to Personal Representatives continued...

- Abuse, Neglect, and Endangerment Situations, What information can be shared with family members without patient consent or POA, Deceased Persons

Disclosure to Law Enforcement

- Complying with Minimum Necessary standards and disclosure for law enforcement purposes 45 CFR § 164.103, What can be disclosed to Law Enforcement, Correctional Institutes and Other situations

Court Orders and Subpoenas

- Understanding of “Required by Law”
- 45 CFR § 164.512 - Uses and disclosures for which an authorization or opportunity to agree or object is not required, Extreme Risk Protection Orders (ERPO) Disclosures and HIPAA, Warrant and Order Statutes, Considerations when Responding to an ERPO
- Subpoenas

Medical Record Access Requirements

- General Record Retention Rules- CMS versus HIPAA
- Consequences to Lack of Record Maintenance Requirements, Signature Requirement Standards
- Release of Information to CMS for Audit/Review Purposes, CMS enforcement of [42 CFR 424.516\(f\)](#)
- Best Practices to Avoid Non-Compliance, Basic Tips when Responding to a Payer Requesting More Information

42 CFR Part 2 - Substance Abuse Confidentiality Regulations

- Substance Use Disorder and Protecting Substance Use Disorder (SUD) Records
 - Substance Abuse and Mental Health Services Administration (SAMHSA)& 42 CFR Part 2
- HIPAA and 42 CFR Part 2



Understanding the Basics of Complying with 42 CFR Part 2 Rules

- How 42 CFR Part 2 Applies to Health Care Providers
- Disclosing Substance Use Disorder Records
 - Electronic Health Information (EHI) Exchange and 42 CFR Part 2, Query-Based Exchange, Directed Exchange
- Multiple-Party Consent Forms

Comply to Right of Access to PHI to Avoid HIPAA Violations

- How OCR Investigates HIPAA Complaints
- History prior to the Final Rule and HITECH
- Current violation structure and annual inflation adjustments
- When a HIPAA Violation is Criminal

Computer Requirements and Time Limits

To successfully complete this course, you will need high-speed internet access, email, Microsoft Word, Microsoft Excel, and Adobe Reader. You must complete this course within three (3) months of your enrollment date or purchase an extension to buy more time (up to 3 months in extensions). Your course enrollment begins when the AIHC Office receives your course tuition payment.

Course Tuition Includes:

- Access to a Qualified Online Instructor If and When You Need Help (Available upon request).
- Training Materials and Access to the Online Training page;
- Online quizzes accessed through the online training page;
- AIHC Membership for One (1) Year: This is available for first-time members only.
- Certificate of Completion upon successfully accomplishing 80% or better in the course.

Need more than a Certificate?

Optional Certification Exam – Earn the Certified Right of Access Specialist (CRASSM) Credential

Option to Certify (remote) by appointment with a professional AIHC proctor is available for an additional \$75 exam fee per attempt. A total of (3) attempts at certification are permitted. You will be provided details via email regarding the option to certify upon successful course completion.

Prerequisite To Certify - To qualify to certify, you must have at least 2 years of experience working for a HIPAA Covered Entity or an organization defined as a HIPAA Business Associate. During your 2 years of such employment, your job is related to viewing, accessing, storing, maintaining, and/or releasing any patient information.

About the Certification Exam

- 100 questions, open note, three (3) hour proctored exam taken online
- Passing score is 80%
- There are four (4) Domains:
 1. Abbreviations, Terms, and Definitions
 2. AI, Right of Access, and Information Blocking
 3. Providing Access, Legal aspects of releasing information, and CMS requesting records
 4. 42 CFR Part 2 and HIPAA Violations/Penalties
- Certification is approved by the Certification Exam Board



Maintaining Your CRASSM Credential

If you certify, you will need to maintain your credential by earning six (6) CEUs annually and paying the AIHC annual membership renewal fee. AIHC also offers free and low-cost CEU programs for our members.

Tuition Non- Member: \$625

AIHC Members Pay \$375 [Members Save \$250]

[Join as a member today and save!](#)

Employers – contact us at 330-241-5635 option #2 when registering multiple employees at the same time.

How to Register for this Course

Register Online – [Click here](#) to return to the Course Page, Enroll and Pay for yourself or your workforce member(s).

We accept online registration payment via credit card.



Register via Mail or Fax: Scroll down for a hard copy enrollment form. Mail or fax your completed form to the AIHC Office to submit your registration and payment information. Note: American Express is only accepted when you register online.

Refund & Financial Policies




View the Refund Policy and Payment Plan Options posted on the Home Page of our website under Financial Policies www.aihc-assn.org



HARD COPY REGISTRATION FORM

Right of Access & Release of Information Compliance Online Training Program

Please submit one form per person

Enrollment Date:	I intend to take the online certification exam after completing this program and understand there is an additional exam fee. <input type="checkbox"/> Yes <input type="checkbox"/> No
Name & Credentials:	
Home Address:	Employer Name & Address:
Current Job Position:	
(For website administration and registration confirmation) Primary Email Address: Alternate Email Address:	Work Phone Number: Alternate or Cell Phone Number:
Credit Card Payment Information: <div style="display: flex; justify-content: center; align-items: center; gap: 20px;">    </div> <div style="display: flex; justify-content: center; align-items: center; gap: 20px;"> <input type="checkbox"/> MasterCard <input type="checkbox"/> VISA <input type="checkbox"/> Discover </div> <p>Amount Approved on this Credit Card: <input type="checkbox"/> Non- Member Price: \$625.00 <input type="checkbox"/> AIHC Member Price: \$375.00</p> <p>Card Number: _____</p> <p>Security Code: _____ Expiration Date: _____</p> <p>Billing Address for this Card: _____</p> <p>Name As It Appears on this Card: _____</p> <p>Authorized Signature & Date: _____</p> <div style="text-align: center; padding: 20px 0;"> <p>Please Make Checks Payable to: AIHC</p> <p><input type="checkbox"/> Non- Member Price: \$625.00 <input type="checkbox"/> AIHC Member Price: \$375.00</p> <p>AIHC Mailing Address: 3637 Medina Road, Suite 15, Medina, Ohio 44256</p> <p>AIHC Fax Number: (330) 952-0716</p> <p>How did you hear about us?</p> <p> <input type="checkbox"/> Mail <input type="checkbox"/> Email <input type="checkbox"/> Co-Worker <input type="checkbox"/> AIHC Website <input type="checkbox"/> Social Media <input type="checkbox"/> Other: _____ </p> </div>	

