



## Is it Second Nature? Can it Be?

### Actions Without Reason

- Turn off the Alarm
- Turn on the TV
- Grab the phone or tablet
- Stretch

Which one of these things is not like the other? And not just because it's not electronic. One or more of these actions are automatic to most of us as soon as you wake. It may be irritating at first, but try not to do them. But, you've got to be of strong mind and powerful will not to stretch. Consciously, deliberately don't do it. It's not just second nature, it's nature. The body triggers that action, not our environment or our training.

The other things are all trained responses. They tend to happen automatically, but they have been a programmed response most likely for decades. They've become second nature. There are other things you do daily that are also programmed responses. That's how you got to work. You know when to use your turn signals, gas and brake; although some of us are better at that than others. Once you get to work, other things kick in, like turning off the security system, turning on the lights and equipment, making a cup of joe.

What about protecting patient information? Sure, you have your policies. You've been told to have a Security Risk Assessment done. You might have a manual. You may even have employee forms and some signage. However, is everything you do to 'protect' patient privacy second nature? Is it second nature to your staff? Can you rest assured that if you were audited, you'd pass with flying colors; so well that OCR could write a book about how to do things right?

We all make mistakes. It's bound to happen. The difference in an accident and willful neglect is having a "*culture of compliance*". More than policies 'templates' that are just written up in your HIPAA manual, your documents reflect the procedures you perform every minute of every day. More than having the required reports, you review, examine, edit and implement the suggested changes outlined in your reports. More than signed BAA's, you've checked the HIPAA compliance understanding your BA's possess. More than annual employee training, you perform random self-audits, hold regular training sessions and have an outlined understandable Sanctions policy,

The bad thing about programmed responses is they can be re-learned. Let's just take that turn signal. We were all taught years ago when and how to use them. After driving for so many years, you figure we'd just do it. But, sometimes, we forget, or we are distracted or stressed, or just don't care. After once or twice of *not* using them, it's easy to just use them when it's absolutely necessary or at the last minute.

HIPAA compliance may not be as natural as a stretch first thing in the morning. But, it certainly wouldn't hurt putting forth the effort to try and make it be. Everyone that works for and with you should have the same mindset, the same concerns and the same automatic response. You should be able to see issues in your own practice and identify what's missing from the companies you work with; whether they be other CE's or your BA's. We received a call recently and the caller said, "these people need some HIPAA training". Could that be said of your office?