

Coastal Valleys EMS Agency

Serving Mendocino, Napa and Sonoma Counties



MEMORANDUM

TO: CVEMSA Provider Agencies
FROM: Bryan Cleaver, EMS Specialist
RE: **HIPAA Compliance**
DATE: April 22, 2003

We have been working with JoAnn Borri, Sonoma County Compliance/Privacy Officer, responsible for ensuring compliance with the Health Insurance Portability and Accountability Act (HIPAA) within our organization. Based on analysis of the functions and services performed by the CVEMSA in its primary role as a regulatory agency, it has been determined that the EMS Agency is not a "Covered Entity" as defined by HIPAA regulations. Therefore, the HIPAA regulations, including the requirement for business associate agreements, do not apply to our activities or relationships.

However, you may be required to address specific HIPAA compliance issues within your organization. Please seek your own counsel in this regard.

As we continue to research areas of possible exposure to HIPAA regulations we are drafting position papers in an effort to assist our providers and ensure consistent compliance. The following areas of potential exposure have been addressed:

1. EMS Data management systems, including, but not limited to, the Electronic Pre-hospital Care Information System (EPCIS).
2. Transfer of care and patient information between transport agency and receiving hospital.
3. Communications Centers; REDCOM and Computer Aided Dispatching programs, which also electronically transfer patient information.
4. Quality Improvement Committees.
5. Trauma Audit Committee
6. Trauma Registry

Position papers are available for any of the above items. To obtain a position paper or for other additional information please contact Bryan by email or telephone:

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