

QAPIShield™ Resident Identification & Privacy Policy

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Document Type: Official Policy Documentation

Purpose

This policy establishes the standards and procedures for resident identification within QAPIShield™, ensuring compliance with HIPAA regulations while supporting Quality Assurance and Performance Improvement (QAPI) initiatives in skilled nursing facilities.

Scope

This policy applies to all staff members, administrators, and authorized users who access or interact with QAPIShield™ within the facility.

Policy Statement

1. Resident Identification Method

QAPIShield™ uses a **de-identified reference system** for tracking residents. This system is designed to:

- Maintain resident privacy in accordance with HIPAA requirements
- Support accurate risk tracking and prevention monitoring
- Enable seamless integration with existing Electronic Health Record (EHR) systems

Approved Reference ID Types:

Reference ID Type	Description	Example Format
Medical Record Number (MRN)	Primary identifier from EHR system	MRN-12345
Census ID	Facility census tracking number	C-0089
EHR Resident ID	PointClickCare, MatrixCare, or other EHR ID	PCC-45678
Internal Facility Number	Custom facility-assigned identifier	RES-2024-0001

2. Data Privacy Standards

QAPIShield™ adheres to strict data privacy standards:

What QAPIShield™ Does NOT Store:

- Resident names
- Social Security Numbers
- Date of birth (exact)
- Direct contact information
- Photographs or biometric data
- Any other direct identifiers as defined by HIPAA

What QAPIShield™ DOES Store:

- Facility-controlled Reference IDs
- De-identified clinical risk factors
- Age ranges (not exact ages)
- Unit/room assignments
- Risk assessment scores
- Care plan documentation
- QAPI metrics and trends

3. Two-System Data Model

QAPIShield™ operates using a **two-system approach** that separates protected health information (PHI) from quality improvement data:

System 1: Electronic Health Record (EHR)

- Contains resident names and full medical records
- Maintains all PHI and clinical documentation
- Serves as the authoritative source for resident identity

System 2: QAPIShield™

- Tracks risk, prevention, and QAPI data
- Uses only de-identified Reference IDs
- Links back to EHR via Reference ID for authorized staff

This separation ensures that even in the unlikely event of a data breach, resident identity remains protected within the EHR system.

Staff Responsibilities

All staff members are responsible for:

1. Using Correct Reference IDs

- Always verify the Reference ID matches the resident’s EHR record
- Report any discrepancies immediately to the supervisor

2. Maintaining Confidentiality

- Never share login credentials
- Log out of QAPIShield™ when not in use
- Report suspected unauthorized access

3. Following Documentation Standards

- Enter accurate clinical observations

- Complete assessments in a timely manner
- Review and acknowledge risk alerts

Compliance Framework

HIPAA Compliance

QAPIShield™ supports HIPAA compliance through:

- **De-identification:** All resident data is de-identified per HIPAA Safe Harbor guidelines
- **Access Controls:** Role-based access ensures staff only see data relevant to their responsibilities
- **Audit Trails:** All system access and data modifications are logged
- **Encryption:** Data is encrypted in transit and at rest

Survey Readiness

This policy supports survey readiness by:

- Providing clear documentation of privacy practices
- Demonstrating systematic approach to quality improvement
- Maintaining accurate records of risk assessments and interventions

Training Requirements

All staff members must:

1. Complete initial QAPIShield™ training before system access
2. Acknowledge understanding of this privacy policy
3. Complete annual refresher training on privacy and security practices

Policy Violations

Violations of this policy may result in:

- Immediate suspension of QAPIShield™ access
- Disciplinary action per facility policy
- Reporting to appropriate regulatory authorities if required

Questions and Support

For questions about this policy or QAPIShield™ usage:

- Contact your Director of Nursing (DON)
- Reach out to your facility Administrator
- Submit a support request through QAPIShield™

Document Control

Version	Date	Author	Changes
1.0	December 2024	QAPIShield Compliance Team	Initial release

QAPIShield™ — AI-Powered Risk Prevention & Survey Protection for Skilled Nursing Facilities

This document is confidential and intended for authorized facility use only.