

# QAPIShield™ Resident Identification & Privacy Policy

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**Effective Date:** December 2024

**Version:** 1.0

**Document Type:** Official Policy Documentation

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## Purpose

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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.

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## Scope

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

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## Policy Statement

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### 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.

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## Staff Responsibilities

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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
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## Compliance Framework

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### 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
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## Training Requirements

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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
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# Policy Violations

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Violations of this policy may result in:

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

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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™
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# Document Control

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

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

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