

	The Privacy Framework's categories and sub-categories are intended to be capable of including the full scope of potential privacy policies. However, they are neither a minimum set of actual privacy requirements nor an expression of actual policies. Actual policy requirements are expressed in Policy Requirements column.	The Description column defines either the category or sub-category in terms of scope and typical requirements. The statements in the Description column must be instantiated by policy, laws or regulations in order for TC to implement specific standards.	Applicability					
			Source System at Point of Record Origination	Source System at Point of Record Retention	Source System at Point of Record Transmittal/Disclosure	Receiving System at Point of Record Receipt	Receiving System at Point of Record Retention	Receiving System at Point of Record Access/Use
Category	Sub-Category	Description						
Collection		Collection of information, i.e., individually identifiable health information (IIHI), (shall, should, may) be necessary	X					
		Consent (shall, should, may) be obtained or collection (shall, should, may) be authorized by or under law	X					
		Individuals (shall, should, may) be fully informed of the collection.	X					
	Limiting Collection by Purpose	Information collection (shall, should, may) be limited to and required for only the identified purpose	X					
		Purpose of collection (shall, should, may) be clear at or before time of collection	X					
		Information (shall, should, may) be collected by fair and lawful means.	X					
	Minimum Necessary By Purpose	Collection (shall, should, may) be limited to the minimum amount of data necessary to achieve the purpose for which the collection is being done. This applies to identifiers of a person as well as any other health information about that person.	X					
		The assignment of a subject's identifier to the data being collected (shall, should, may) be done only when necessary and allowed and in accordance with prescribed circumstances.	X					

Use		Use of information (shall, should, may) be necessary						X
		For certain uses, individual consent or authorization (shall, should, may) be required or such use (shall, should, may) be authorized by or under law.						X
	Permitted Uses	Information use (shall, should, may) be limited to and required for only the identified purpose						X
		Use (shall, should, may) or not be conditioned on patient consent or authorization						X
	Minimum Necessary by Purpose	Information being used (shall, should, may) be limited to the minimum amount necessary to achieve the purpose for the use. This applies to identifiers of a person as well as any other health information about that person.						X
Disclosure		Disclosure of information (shall, should, may) be necessary			X			
		For certain disclosures, consent or authorization (shall, should, may) be required or disclosure (shall, should, may) be authorized by or under law			X			
	Permitted Disclosures	Information disclosure (shall, should, may) be limited to and required for only the identified purpose			X			
		Disclosure (shall, should, may) or not be conditioned on patient consent or authorization.			X			
	Minimum Necessary by Purpose	Disclosure (shall, should, may) be limited to the minimum amount of information necessary to achieve the purpose for which the disclosure is being made. This applies to identifiers of a person as well as any other health information about that person.			X			

	Cross-Policy Domain Data Flows	<p>Disclosure (shall, should, may) be permitted if it has been ascertained that recipient is subject to comparable information privacy scheme; or</p> <p>Disclosure is with individual's consent; or</p> <p>Disclosure is necessary by contract at the request of, or to benefit of the individual</p>			X			
Consent		<p>Individual (shall, should, may) have the right to control collection, use and disclosure of PHI as established by law or regulation.</p> <p>There are three forms of consent: deemed, implied or active.</p> <p>Deemed consent is determined by jurisdictional law or regulation authorizing collection, use or disclosure without active individual consent, e.g., disclosures for public health.</p> <p>Implied consent is an opt-out option in which an individual must actively refuse collection, use and disclosure of PHI.</p> <p>Active consent is when the individual must provide authorization before the collection, use and disclosure of PHI may occur.</p>	X		X			X
	Easy to Use and Understand	Forms authorizing consent shall be in plain language that explains the individual's options and purpose of consent	X					X
	Consistent with Quality Care	Consent for collection, use and disclosure requirements shall not create barriers to providing medically necessary care but be part of the normal process of quality care delivery.	X					X

	Respectful of Individual Needs	Social, cultural, literacy, religious needs	X					X
		Medical conditions	X					X
		Individual's sensitive information needs	X					X
		Other	X					X
	Right to Control Access by Others	Individuals (shall, should, may) have control over whether and how their information is shared.	X		X			X
		The individual (shall, should, may) have the ability to opt-out in whole or part.	X					X
		The individual (shall, should, may) be able to limit use and disclosure of information for commercial purposes.	X		X			X
		The individual (shall, should, may) have the revocable right to designate someone else to exercise this control.	X		X			X
	Revocation	Individuals (shall, should, may) have the right to revoke consent or authorization to future access.	X		X			X
Other Individual Rights	Access to One's Own Information By Individual	Upon request, an individual (shall, should, may) be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. Access (shall, should, may) be reasonable, appropriate, convenient, affordable, direct and secure. Access (shall, should, may) be to all of an individual's records (except if danger to the individual or another). Access shall include right to review and copy.						X
	Access to an Individual's Information By Personal Representative of Individual	Personal representatives (shall, should, may) be authorized by individual or by law						X
	Amendment of an Individual's Information by Individual or Personal Representative	Individual (shall, should, may) have the right to challenge the accuracy and completeness of their information and request amendment as appropriate. Organization (shall, should, may) determine whether to accept amendment and if declined, has process for appeal						X

	Request Restrictions	Individual (shall, should, may) have the right to request restrictions on the use and disclosure of his/her health information			X			X
	Request Private Communications	Individual (shall, should, may) have the right to request that communications of health information be done by alternative means and to alternative locations			X			X
Protect Information (Data)		Individually Identifiable Health Information/ Protected Health Information (See glossary)						
	Confidentiality	Information (shall, should, may) not be made available or disclosed to unauthorized persons			X			X
	Anonymity	Anonymity to individual (shall, should, may) be allowed where lawful and practical			X			X
	Availability	Information (shall, should, may) be accessible and useable by authorized person			X			X
	Integrity	Information (shall, should, may) not be altered or destroyed in an unauthorized manner	X					X
Accountability and Oversight		For personal health information an individual (shall, should, may) be designated accountable	X	X			X	X
		For compliance						
		To establish third party agreements						
		To establish privacy policy						
		To conduct privacy impact assessments.						
	Oversight	Compliance with policies (shall, should, may) be monitored with informed public oversight and consumer involvement.						
	Complaint Process	There (shall, should, may) be a process for handling complaints. An individual may challenge all practices not in alignment with stated policies.						

	Information Management Policy	It (shall, should, may) be easy to understand what policies are in place, how they were determined and how to make inquiries or comment. It (shall, should, may) be clear who has access to what information for what purpose.	X					X
	Notice of Privacy Policies and Rights	There (shall, should, may) be a process for providing notice of privacy practices and an individual' privacy rights to individuals that clearly describes how personal health information is handled and made making readily available as well as rights individual may assert under law, regulation, policy or practice.						
	Mitigation of Harm	Individuals may make complaint and request appropriate action						
	Accounting of Disclosures (Traceability)	Access (shall, should, may) be tracked and audited. Organizations (shall, should, may) provide individual with list of any disclosures outside of policy.			X			X
	Education	Organizations that maintain information (shall, should, may) insure that all authorized users receive adequate instruction on proper collection, use and disclosure of information	X		X			X