

Case Examples and Resolution Agreements

These examples show how covered entities can effectively comply with the requirements of the Privacy and Security Rules. Periodically, we update this page with case examples of the corrective actions that OCR obtains from covered entities through our enforcement efforts.

Case Examples

Case Examples Organized by Covered Entity	Case Examples Organized by Issue
<ul style="list-style-type: none">▪ General Hospitals▪ Health Care Providers▪ Health Plans / HMOs▪ Outpatient Facilities▪ Pharmacies▪ Private Practices	<ul style="list-style-type: none">▪ Access▪ Authorizations▪ Business Associates▪ Conditioning Compliance with the Privacy Rule▪ Confidential Communications▪ Disclosures to Avert a Serious Threat to Health or Safety▪ Impermissible Uses and Disclosures▪ Minimum Necessary▪ Notice▪ Safeguards

Resolution Agreements

Resolution Agreements and Civil Money Penalties -A resolution agreement is a contract signed by HHS and a covered entity in which the covered entity agrees to perform certain obligations (e.g., staff training) and make reports to HHS, generally for a period of three years. During the period, HHS monitors the covered entity's compliance with its obligations. A resolution agreement likely would include the payment of a resolution amount. These agreements are reserved to settle investigations with more serious outcomes. When HHS has not been able to reach a satisfactory resolution through the covered entity's demonstrated compliance or corrective action through other informal means, civil money penalties (CMPs) may be imposed for noncompliance against a covered entity. To date, HHS has entered into five resolution agreements and issued CMPs to one covered entity.

- [Resolution Agreement with Providence Health & Services](#)--July 16, 2008
- [Resolution Agreement with CVS Pharmacy, Inc.](#)--January 16, 2009

- [Resolution Agreement with Rite Aid Corporation](#)--July 27, 2010
- [Resolution Agreement with Management Services Organization Washington, Inc.](#)--December 13, 2010
- [Civil Money Penalty issued to Cignet Health of Prince George's County, MD](#)--February 4, 2011
- [Resolution Agreement with General Hospital Corp. & Massachusetts General Physicians Organization, Inc.](#)--February 14, 2011

Source: OCR's website: Case Examples and Resolution Agreements

<http://www.hhs.gov/ocr/privacy/hipaa/enforcement/examples/index.html>