

the vendor's BAA, perhaps with an attorney, must be done to determine its scope and limitations. Again, vendors who must use PHI but refuse to sign a BAA should be avoided.

If the vendor uses subcontractors in providing services to the dental practice, a BAA should be in place between the vendor and its subcontractors that complies with all Security Rule requirements and many Privacy Rule requirements.

### Defining a BAA

BAAs are designed to obtain satisfactory assurances that the business associate will safeguard PHI according to the standards of the Privacy and Security Rules of HIPAA. A covered entity can add clarifications and limit the permissible uses and disclosures of BAAs with business associates and can set up additional requirements.

The elements of a BAA must include the following:

- Establish permitted and required uses and disclosures of PHI by the business associate.
- Prevent the business associate from using or disclosing information other than as agreed to or according to legal requirements.
- Require the business associate to implement appropriate safeguards to prevent uses or disclosures that are unauthorized.
- Require reports from the business associate to the covered entity regarding uses or disclosures of information not covered in the agreement.
- Require disclosure of PHI as specified with respect to individuals' requests for copies of their PHI and make available PHI for amendments and accountings.
- Require the business associate to comply with the requirements applicable to the obligations of the covered entity under the Privacy Rule to the extent that it is possible.
- Require the business associate to make available to the US Department of Health and Human Services Office for Civil Rights (OCR) its internal practices, books, and records related to the use and disclosure of PHI received from or created or received by the business associate on behalf of

the covered entity for the purposes of OCR determining whether the covered entity is in compliance with the Privacy Rule.

- When the business relationship is terminated, the business associate is required to return or destroy all PHI received from or created or received by the business associate on behalf of the covered entity, if possible.
- Require that any subcontractors engaged by the business associate who will have access to PHI agree to the same restrictions and conditions the business associate observes.
- Authorize the termination of the agreement by the covered entity if the business associate violates a material term of the agreement.

### Clinical Significance

HIPAA regulations are designed to keep PHI safeguarded from breaches and exposure beyond the control of the health care entity with which the patient has an association. Within the HIPAA realm exist not just the covered entity but also business associates and their subcontractors, all of whom are responsible for taking care of sensitive health information. Each dental office must identify which entities, individuals, or others constitute business associates who should sign BAAs and which ones do not qualify as business associates and will not need to be covered by these agreements. All HIPAA-covered entities should maintain a log of their identified business associates, their contact information, and the dates these entities or individuals signed BAAs, when they will expire, and when they are to be renewed.

CDA Practice Support: HIPAA business associate agreements. CDA J 46:331-332, 334, 2018

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# MILLENNIALS

## Are millennials really a different breed of dentist?



### BACKGROUND

When you say, "Millennials," it tends to conjure up pictures of narcissistic, lazy, selfie-loving entitled young people who don't hold to the values of generations past. Those are the tags applied to this generation, but are these views true? Do they have a root in fact? It's important to evaluate where the views come from and

what millennials actually want and are faced with in their careers as dentists.

### SOURCES OF STEREOTYPES

Most of the stereotypes relating to millennials come from the internet. In many cases, the research actually does not cite

specific studies or present any concrete evidence. In some cases, facts may be given, but they are taken out of context. For example, the fact that millennial suicide rates have increased 8% in the past 15 years is cited without also indicating that suicide rates for middle-aged individuals have increased 63% for women and 43% for men. These latter data indicate much greater increases among older individuals than among millennials. This sort of taking facts out of context creates a false view of millennials.

Once a view has been expressed in this way, it takes on a life of its own. These questionable data cultivate a stereotype that is then assumed to be true and passed along to others. Dentists are trained in evidence-based principles and should recognize these misused facts and not simply accept them.

## HOW MILLENNIALS ARE LIKE OTHER GENERATIONS

In a 2012 meta-analysis by researchers at The George Washington University and the Department of Defense, 20 studies on generational differences in work-related attitudes were evaluated. The conclusion was that meaningful differences between generations probably don't exist, with differences that are seen probably more attributable to the individuals' stage of life than to their membership in a particular generation. These results have been echoed in a 2015 CNBC survey and an IBM report. The IBM team held that the "typical millennial" view that has been accepted is just a collection of myths. *The Harvard Business Review* has stated that employees of all ages exhibit more similar attitudes and values at work than they show differences. Research tends to show that every generation of younger people is more narcissistic than older people because we tend to get over ourselves as we age. Millennials tend to want the same things that generations that preceding them want: a good job and a good life in the right balance.

## HOW MILLENNIALS ARE DIFFERENT

In the context of dental practice, millennials do show some differences from other generations. Among these are the following:

- Millennials know technology and prefer it. This includes a need to stay informed and up to date with the latest technology and valuing continuing education as a way to maintain their technical expertise.

- Millennials graduate from dental school with more debt each year.
- Millennial dentists also often have salaries that are decreasing, which makes their debt-to-income ratio increasingly disproportionate.
- New dentists are increasingly selecting practice options in corporate dental practices or group practices. The increase in dental schools has the potential to address access issues and care for rural areas, but the percentage of dental school graduates who choose to work in underserved areas is just 1% to 15%, with most graduates choosing to practice in urban areas. This creates challenges as practices must differentiate themselves from the others, often by staying open later or on weekends. Of course, the new dentist is the one who must fill these extended hours, making it difficult to have a fulfilling work-life balance. Sometimes new employee dentists only work a couple of days a week, making it difficult to pay back loans without taking on a second job. Thus the millennials' work life may not be as fulfilling and more millennials may be seen as disloyal, whereas they are actually just tired of the constant work demands.
- Millennials are the most connected of any generation, along with being the most educated. They know what's going on with everyone all the time. While this can be a good thing, it can also lead to discontent when they see other millennials able to obtain valued situations, lifestyles, travel, and vacations that they can only dream about.

### Clinical Significance

Millennial dentists want many of the same things that older professional friends wanted at their age. Maybe older dentists have forgotten what it is like to be young associate dentists just out of dental school. There is a certain value to engaging in lots of communication between older and younger individuals. That's how we can connect and begin to see that our similarities greatly outweigh our differences. We all need to be ourselves and learn to accept others for who they are.

Vaughn J: Are millennials really that different? Yes. No. It's complicated. *CDA J* 46:379-384, 2018

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