 <p>Heritage Provider Network &amp; Affiliated Medical Groups</p>	Program: Compliance			
	Policy No.	Effective Date: 01/01/2012	Page - 1 -	
	Authored by: Compliance Committee	Date: 01/01/2012	Revised by: Sandy Finley	Date: 02/02/2015
	Approved by: Compliance Committee	Date: 02/02/2015		
Title of Policy: Employee Privacy Orientation and Training				

**PURPOSE:**

To ensure that covered entities train all members of their work force on the policies and procedures with respect to PHI required by Health Insurance Portability and Accountability (HIPAA) and Health Information Technology for the Economic and Clinical Health (HITECH) Act as necessary and appropriate for the members of the work force to carry out their function within the covered entity.

To protect patient and employee privacy according to HIPAA Administrative Simplification and Breach Notification for Unsecured Protected Health Information as outlined in the HITECH Act.

**POLICY:**

It is the policy of Heritage Provider Network and Affiliated Medical Groups to provide new hire training and ongoing training to ensure employees are aware, knowledgeable, and comply with the regulations related to the HIPAA and HITECH Act.

**RESPONSIBILITY:**

HIPAA/Compliance Officer and Corporate Compliance Officer


**PROCEDURE:**

**Initial Training:**

1. All new employees will receive orientation on HIPAA regulations and the HITECH Act.
2. New employees will complete the HIPAA training and will pass a quiz following the training.
3. The completed quiz following the training will be graded automatically. All employees are required to have a certificate of completion in their personnel files which they sign and acknowledge they have received the training and understand the HIPAA regulations and the HITECH Act.

**Monthly HIPAA and HITECH Act Notifications:**

1. Provide monthly updates and reminders to the employees.
2. Employees will be provided an opportunity to ask questions or discuss the monthly training topic in their monthly staff meetings.

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Annual In-Service:

1. HIPAA and HITECH Act training is included in the Mandatory Annual In-Service during the National Privacy and Security Week in the month of April.
2. A review of basic HIPAA and HITECH Act regulations will be included in the training.
3. New or upcoming legislation will be introduced during the annual in-service.
4. Employees will sign an acknowledgement stating they have received and understand the training.

Oversight:

1. On a semi-annual basis, the Compliance Officers will audit each group's electronic data to make sure that strict adherence to the policies occurs in auditing the following information:

REFERENCE: 45 CFR § 160, 162 and 164