 <p>Heritage Provider Network &amp; Affiliated Medical Groups</p>	Program: HIPAA Compliance			
	Policy No.	Effective Date: 01/01/2012	Page - 1 -	
	Authored by: Compliance Sub Committee	Date: 01/01/2012	Revised by: Sandy Finley	Date: 04/07/2015
	Approved by: Compliance Committee	Date: 04/07/2015		
Title of Policy: General Security Controls				

**PURPOSE:**

To ensure that Heritage Provider Network and its Affiliated Medical Groups (HPN) maintain general security controls to safeguard confidentiality and security of patient protected health information.

**POLICY:**


It is the policy of HPN to require that all employees sign an acknowledgement of Patient Confidentiality and Privacy Agreement upon the handling of any patient protected information and annually thereafter. Additionally, employees, temporary staff, subcontractors, etc. will be checked against the OIG/GSA before making any offers of employment and then on a monthly basis. Any employees found to be on such lists are ineligible to participate in providing health services and will not be employed by HPN. Employees, Physicians, temporary staff, subcontractors, and others involved in the organizational operations employed within our organization that are deemed ineligible through verification of the OIG/GSA, will be immediately terminated.

**RESPONSIBILITY:**

All employees, temporary staff, Physicians, subcontractors of Heritage Provider Network and its Affiliated Medical Groups.

**PROCEDURES:**

1. Candidates and providers that are considered for employment or contract at HPN are processed by conducting a thorough background check including being verified against the OIG/GSA state sanctioned databases before making a final offer.
2. Candidates found on such lists will not be eligible for employment or subcontracting services.
3. New employees, Physicians, or subcontractors will not have access to patient protected health information until they sign a confidentiality agreement acknowledging that it is both a legal and ethical right to protect the privacy of patients and employees of HPN.
4. Upon hire, but no later than 90 days, all employees must be educated on the expectations set forth in the Heritage Compliance Plan and successfully pass all training modules which

 <p>Heritage Provider Network &amp; Affiliated Medical Groups</p>	Program: HIPAA Compliance			
	Policy No.	Effective Date: 01/01/2012	Page - 2 -	
	Authored by: Compliance Sub Committee	Date: 01/01/2012	Revised by: Sandy Finley	Date: 04/07/2015
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consists of HIPAA, Code of Conduct, Fraud, Waste and Abuse, Injury & Illness Prevention, and, as applicable, Model of Care.

5. All employees of HPN will annually participate in Compliance training and upon passing the HIPAA module, will sign the certification which also includes a Confidentiality of Patient Information agreement.
6. All employees, providers, and subcontractors will be verified against the OIG/GSA state sanctioned databases to ensure they are eligible to participate. Employees, Physicians, subcontractors, etc. found to be ineligible will be terminated immediately.
7. All acknowledgements of the Confidentiality of Patient Information Agreement will be maintained in each employee's personnel record.
8. Verification of the OIG/GSA will be processed and maintained in the Morrissey/UltiPro system.