

 <p style="text-align: center;">Heritage Provider Network & Affiliated Medical Groups</p>	Program: HIPAA 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: HIPAA Compliance and Enforcement				

PURPOSE:

To ensure the compliance and enforcement of applicable standards, requirements, and implementation specifications.

POLICY:

Heritage Provider Network and Affiliated Medical Groups will adhere to the compliance procedures outlined in the Compliance Program. For reporting purposes, Covered Entities will comply with all of HHS requirements as follows:

1. Providing records and compliance reports as deemed necessary by HHS.
2. Cooperating with complaint investigations and compliance reviews
3. Permitting access to information
 - a. Information including facilities, books, records, accounts, and other sources of information, including PHI, that is pertinent to ascertaining compliance
 - b. IF any information required is not in the possession of Heritage Provider Network & Affiliated Medical Groups and other source fails or refuses to furnish the information, Heritage Provider Network & its Affiliated Medical Groups must certify and set forth their efforts to obtain the information.
 - c. PHI obtained by HHS in connection with an investigation or compliance review will not be disclosed, except if necessary for ascertaining or enforcing compliance review.

RESPONSIBILITY:

HIPAA/Compliance Officer and Corporate Compliance Officer

PROCEDURE:

1. All complaints will be reported to the appropriate supervisor and to the Compliance Committee.
2. All reported complaints regarding compliance will be reviewed by the Compliance committee.
3. HIPAA committee will conduct investigations and make corrective action plans to resolve the issue.
4. In the event that HHS needs to conduct a compliance review, the Compliance Committee will cooperate in providing necessary information requested.



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REFERENCE: 45 CFR § 160.304