

 <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
	Approved by: Compliance Committee	Date: 02/02/2015	Date: 02/02/2015
Title of Policy: Mitigation of Violations			

**PURPOSE:**

To provide guidelines for reducing the impact of improper or unlawful use of protected health information.

**POLICY:**

Heritage Provider Network and Affiliated Medical Groups will take action to reduce or eliminate, to the greatest extent feasible, any known harm resulting from any improper or unlawful use or disclosure of protected health information (PHI).

**RESPONSIBILITY:**

Senior Management, Privacy Officer/Health Information Management Director, Customer Service Manager

**PROCEDURES:**

1. All reported privacy breaches are evaluated according to the steps set forth in the Patient Grievance/Complaint Policy and Sanctions for Privacy Violations Policy.
2. When a privacy breach is established, Heritage Provider Network and Affiliated Medical Groups will take immediate steps to reduce or eliminate any harmful effects.
3. All impacted parties, such as patients, members and health plans, will be notified.
4. All groups will comply with reporting requirements as set forth in HIPAA COW.

In the event that harm has already occurred, Heritage Provider Network and Affiliated Medical Groups will dedicate the necessary resources to mitigate the harmful effects to the extent practicable.

**REFERENCE:**

HIPAA Privacy Rules, 45 CFR §164.530 (f)