

Huntington Care Network

A PARTNER *of* HUNTINGTON HOSPITAL

General HIPAA Compliance Policy

PURPOSE:

The purpose of this document is to outline the general HIPAA Compliance Policy adopted by Huntington Care Network ACO, LLC in order to recognize the requirement to comply with the Health Insurance Portability Act of 1996 ("HIPAA"), as amended by the HITECH Act of 2009 (ARRA Title XIII). It is also to recognize our responsibility to protect individually identifiable health information under the regulations implementing HIPAA, other federal and state laws protecting the confidentiality of personal information, and under general professional ethics.

This policy governs overall HIPAA compliance for Huntington Care Network and its relationships. All personnel of the ACO must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibilities of every member of the workforce.

Officers, agents, employees, contractors, temporary workers, and volunteers must read, understand and comply with this policy.

ASSUMPTIONS:

- Huntington Care Network must comply with HIPAA and the HIPAA implementing regulations, in accordance with the requirements at Sections; 164.194; 164.306, and HITECH Act 13401.
- Compliance with HIPAA is mandatory and failure to comply can bring severe sanctions and penalties.
- Compliance with HIPAA will strengthen the ACO's ability to meet other compliance obligations, and in fact will support to strengthen our non-HIPAA compliance requirements and efforts.

POLICY:

- It is the policy of Huntington Care Network to become and to remain in full compliance with all the requirements of HIPAA.
- It is the policy of Huntington ACO to fully document HIPAA compliance-related activities and efforts, in accordance with our documentation Policy.
- All HIPAA compliance -related documentation will be managed and maintained for a minimum of six years from the date of creation or last revision, whichever is later, in accordance with Huntington's ACO Documentation Retention Policy.

COMPLIANCE AND ENFORCEMENT:

All managers and supervisors are responsible for enforcing this policy. Employees who violate this policy are subject to discipline up to and including termination in accordance with Huntington ACO's sanction policy.