



COMPLIANCE NEWSLETTER

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REPORT ALL CONCERNS!

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Corporate Compliance
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STEPS to PROTECT and SECURE Health Information

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Below are a few basic tips to protect your mobile device and, most importantly, protect Protected Health Information (PHI):

ALWAYS

- Make sure your device is password protected.
- Lock the screen of the device when not in use.
- Set your mobile device to automatically log you off or lock your screen after a short period of inactivity (within five minutes).
- Use a privacy screen.
- Lock the screen of the device and keep it in a secure location when not in use.
- Install and enable encryption (This should be done by your IT Department).
- Install and activate remote wiping or remote disabling. (This should be done by your IT Department).

DO NOT

- Do not share your password with anyone.
- Do not walk away from your mobile device in a public place.....ever!
- Do not use unsecured public Wi-Fi network to access, transmit or receive health information.
- Do not install or use file sharing applications.
- Do not install applications without the permission of the IT Department.

We must ensure that administrative, physical and technical safeguards are in place at all times. This is the responsibility of all employees who use a mobile device.

CMS Element I

of an Effective Compliance and Ethics Program

I. Written Policies, Procedures and Standards of Conduct

Standards (Code) of Conduct

1. Articulates our commitment to comply with all applicable Federal and State standards
2. States HPN's overarching principles and values by which we operate; and define the underlying framework for Policies & Procedures.
3. Describes our expectations that all employees conduct themselves in an ethical manner.
4. Describes that issues of non-compliance and potential FWA are reported through appropriate mechanisms; and that reported issues will be addressed and corrected.
5. Communicates that compliance is everyone's responsibility.

Written Policies & Procedures

1. HPN's policies & procedures are detailed and specific, and describe HPN's operation of compliance program.
2. Provides guidance to employees and others on dealing with suspected, detected or reported compliance issues.
3. Addresses compliance and FWA training requirements, how to report, and how issues are investigated, addressed, and remediated.
4. Includes a policy of non-intimidation and non-retaliation for good faith participation in the compliance program, including, but not limited to, reporting potential issues, investigating issues, conducting self-evaluations, audits and remedial actions, and reporting to appropriate officials.

HPN's Standards of Conduct, Policies & Procedures, and the CMS 7 Elements may be found on the HPN Compliance Program website: <https://www.hpnaco.com/Compliance/site/login>



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