


<p><b>DEPARTMENT:</b> Compliance</p> <p><b>POLICY TITLE:</b> CMP07: General Security Controls</p>	 <p><b>Arizona</b> Priority Care™</p> <p><i>One Goal. One Priority. Your Healthcare.</i></p>	
<p><b>REVIEWED BY:</b> AZPC Compliance Officer</p>	<p><b>REVIEW DATE:</b> 11/08/2019</p>	<p><b>EFFECTIVE DATE:</b> 12/01/2019</p>
<p><b>APPROVED BY:</b> Compliance Committee</p>	<p><b>APPROVAL DATE:</b> 11/11/2019</p>	

**PURPOSE:**

To ensure that ensure that Arizona Priority Care (AZPC) maintains general security controls to safeguard confidentiality and security of patient protected health information.

**POLICY:**

It is AZPC’s policy to require that all staff adhere to the Patient Confidentiality and Privacy Agreement contained within the HPN and AZPC Compliance Plan. Staff acknowledge and attest to this Agreement prior to the handling of any patient protected information during their orientation period.

Additionally, employees, temporary staff, subcontractors, etc. will be checked against the OIG/GSA before making any offers of employment/contracting and then on a monthly basis. Any applicants found to be on such lists are ineligible to participate in providing health services and will not be employed by AZPC. Employees, Physicians, temporary staff, subcontractors, and others involved in the organizational operations employed/contracted within our organization that are deemed ineligible through verification of the OIG/GSA, will be immediately terminated.

**PROCEDURE:**

To comply with above policy, AZPC will follow the procedure detailed below:

1. Candidates and providers considered for employment or contract at AZPC are processed by conducting a thorough background and criminal check, including being verified against the OIG/GSA exclusion databases prior to assuming employment/contract.
2. Candidates found on the OIG/GSA exclusion lists will not be eligible for employment or sub-contracting services.
3. New employees, physicians, or subcontractors will not have access to patient protected health information until they receive the AZPC Compliance Plan, which includes a confidentiality agreement acknowledging that it is both a legal and ethical right to protect the privacy of members and employees of AZPC.
4. During the new hire orientation period, but no later than 90 days after hire, and annually thereafter, all employees are educated on the expectations set forth in the AZPC Compliance Plan and successfully pass all training modules which consists of Fraud, Waste and Abuse,

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Code of Conduct/General Compliance, Model of Care, Cultural Linguistics/Disability Sensitivity, HIPAA, Cyber Security, Injury & Illness Prevention, and Harassment.

5. All employees, providers, and subcontractors will be verified against the OIG/GSA exclusion databases prior to hire/contracting and monthly thereafter to ensure they are eligible to participate. Employees, physicians, subcontractors, etc. found to be ineligible will be terminated immediately and reported to the health plans as required.
6. Any providers found to be on the CMS Preclusion list will be excluded in accordance to the CLP-0060 CMS Preclusion List policy.
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 monitoring will be maintained in the Morrissey system.

**DEFINITIONS:**

None

**REFERENCES:**

Heritage Provider Network Policies

**APPENDICES:**

A. Compliance Program Location

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**DOCUMENT REVISION LOG**

<b>Date</b>	<b>Document Modification (including deletions)</b>	<b>Page(s)</b>	<b>Location</b>
11/2019	Transfer to AZPC template	All	All