DEPARTMENT: Compliance POLICY TITLE: CMP11 HIPAA Compliance and Enforcement	Arizona Priority Care TM One Goal. One Priority. Your Healthcare.	
REVIEWED BY: AZPC Compliance Officer	REVIEW DATE: 11/08/2019	EFFECTIVE DATE: 12/01/2019
APPROVED BY: Compliance Committee	APPROVAL DATE: 11/11/2019	

PURPOSE:

To ensure that Arizona Priority Care (AZPC) complies and enforce applicable HIPAA standards, requirements, and implementation specifications.

POLICY:

It is AZPC's policy to adhere to the compliance procedures outlined in the HPN (Heritage Provider Network (HPN) and AZPC Compliance Plan. For reporting purposes, AZPC 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 HPN and/or AZPC and other source fails or refuses to furnish the information, HPN and/or AZPC 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.

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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DEFINITIONS:

None

REFERENCES:

Heritage Provider Network Policies 45 CFR § 160.304

APPENDICES:

None

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DOCUMENT REVISION LOG

Date	Document Modification (including deletions)	Page(s)	Location
04/08/2020	Transfer to AZPC template	All	All