


<p>DEPARTMENT: Compliance</p> <p>POLICY TITLE: CMP12 Privacy Inspection Walk Through</p>		
<p>REVIEWED BY: AZPC Compliance Officer</p>	<p>REVIEW DATE: 11/08/2019</p>	<p>EFFECTIVE DATE: 12/01/2019</p>
<p>APPROVED BY: Compliance Committee</p>	<p>APPROVAL DATE: 11/1/2019</p>	

PURPOSE:

To ensure that Arizona Priority Care (AZPC) conducts a walk through to ensure compliance with the HIPAA policies and procedures, and safeguard protected health information.

POLICY:

It is AZPC’s policy to implement appropriate administrative, technical, and physical safeguards as required by HIPAA regulations to reasonably safeguard Protected Health Information from any intentional or unintentional use or disclosure that violates the Privacy Rule.

PROCEDURE:

1. The Compliance Officer will conduct an annual walk-through inspection of the respective groups.
2. Using the *Privacy Walk-Through Checklist*, all areas of concern will be reviewed and a mark placed in the appropriate column: “Agree”, “Disagree”, or “N/A.” The “Comments” column will be used for clarification or explanation as needed.
3. All completed checklists will be turned in to the Compliance Officer who will bring them to the Compliance Committee for discussion.
4. Recommendations will be made by the Compliance Committee and will be taken back to the respective department heads for action/resolution.
5. The Minutes of the Compliance Committee will reflect problem identification and resolution reflective of the privacy walk-through activities.

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DEFINITIONS:

None

REFERENCES:

HIPAA Privacy Rules
45 CFR 164.502
45 CFR 164.530

APPENDICES:

None

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DOCUMENT REVISION LOG

Date	Document Modification (including deletions)	Page(s)	Location
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