


<p>DEPARTMENT: Compliance</p> <p>POLICY TITLE: CMP26 Confidentiality of Member Information</p>		
<p>REVIEWED BY: 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: 11/11/2019</p>	

PURPOSE:

To ensure that Arizona Priority Care (AZPC) ensures the privacy of medical information in compliance with local, state, and federal laws, rules, and regulations which govern the release of medical information.

POLICY:

It is AZPC’s policy to recognize and protect the right of privacy as set forth in the HIPAA Privacy Standards and the Confidentiality of Medical Information Act, which govern the release of patient- identifiable information by hospitals and other health care providers.

PROCEDURE:

1. Confidentiality of Patient Information
 - a. AZPC complies with federal and state laws and regulations, including HIPAA, regarding the confidentiality of patients’ medical, financial, personal, and other information regarding the member.
 - b. In order to ensure the confidentiality of patient information, AZPC takes all efforts to educate both members and employees of their rights and responsibilities regarding the access and disclosure of patient health information (PHI) (please refer to AZPC’s “Confidentiality Related to PHI” policy).
 - c. AZPC adheres to HIPAA federal regulations in that only the “minimum necessary” information is disclosed regarding a patient issue.
 - d. AZPC further protects against any unauthorized or inadvertent disclosure of information to any individual who does not have an identifiable need for the information. Access to PHI is restricted and only available to authorized users and follows the procedures as listed in the AZPC “Confidentiality Related to PHI” policy.
 - e. AZPC follows all federal and state laws in the event a third party requests a release of a member’s PHI. Legal requests such as subpoenas or court orders are immediately directed to the Compliance Officer and will be handled according to

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the Release of Medical Information policy.

2. Confidentiality Policies and Procedures

- a. AZPC ensures that all of its employees are compliant with HIPAA policies and procedures by conducting audits on each group's electronic data on a semi-annual basis.
- b. AZPC further ensures that all covered entities, including employees, contractors, and business associates, are trained on the policies and procedures with respect to PHI required by HIPAA and the HITECH Act by providing new hire training (for new employees) and ongoing training to ensure entities are aware, knowledgeable, and in compliance. AZPC informs all entities of any written revision and/or changes in the Confidentiality policies and procedures (Employee Privacy Orientation and Training policy; HIPAA Compliance as it relates to Business Associates policy).
- c. AZPC requires that patient/member demographic information is validated and/or updated upon every patient contact to ensure accuracy in electronic systems. Validation is necessary to ensure patient confidentiality when faxing, mailing, or through other methods of patient contact regarding services rendered or for other communications.

3. Compliance Officer

- a. AZPC requires the adherence of all policies regarding the confidentiality of PHI and makes it the responsibility of the Compliance Officer to ensure that all entities are in compliance.
- b. The Compliance Officer also has the responsibility of overseeing all ongoing activities related to the development, implementation, maintenance of, and adherence to the organization's policies and procedures covering the privacy of, and access to, patient health information in compliance with federal and state laws and the healthcare organization's information privacy practices. Further information regarding the Compliance Officer's duties may be found in the job description of the Compliance Officer.

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DEFINITIONS:

None

REFERENCES:

Heritage Provider Network Policies

APPENDICES:

None

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DOCUMENT REVISION LOG

Date	Document Modification (including deletions)	Page(s)	Location
11/2019	Converted to AZPC template	All	All