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HIPAA Policies and Procedures

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1. Introduction and Mission Statement

HIPAA (Health Insurance Portability and Accountability Act of 1996) was passed to achieve two objectives

- a. To improve claims processing-reducing errors, and thereby reducing costs, through electronic claims processing
- b. To provide for the privacy of patient health information

Our practice is committed to electronic claims processing and is working with our software vendors to ensure that this objective is maintained.

We also are committed to making every effort to ensure the privacy of our patients' health information.

2. Privacy Officer

Tracy Miller has been appointed as our practice Privacy Officer. The Privacy Officer is responsible for the following:

- a. Helping our practice comply with ensuring the privacy of patient health information
- b. Designing and implementing a practice privacy training program.
- c. Dealing with outside vendors and contractors who may have access to patient health information.
- d. Dealing with any changes in governmental rulings on privacy and explaining these changes to practice staff and physicians.
- e. Establish reporting mechanisms and dealing with any reports of privacy infractions.

3. Training and Education

All employees and physicians will be involved in training and education programs that are designed to protect the health information of our patients.

Important: no individual is exempt from protecting the health information of our patients.

We will conduct training and education sessions so that all staff and physicians understand our practice privacy policies and procedures.

We also want everyone to participate and welcome any suggestions that will help us maximize patient privacy.

Each staff member and physician will be required to attend at least one meeting per year on Patient Privacy.

4. Reporting Procedures

Any employee or physician who is aware of any possible violation of compliance with our Privacy Policies is expected to report this to the Privacy Officer.

It is to be understood that any of these reports will be treated with the highest degree of confidentiality. All efforts will be made to conceal the identity of the reporting individual.

Furthermore, there will be no actions permitted against the reporting individual.

Uppermost, will be the goal of maintaining the privacy of health information of our patients.

It would be most helpful if the following steps could be taken:

- a. Please fill out a Privacy Incident Report form. All employees and physicians will be supplied with this form.
- b. The form could be handed to the Privacy Officer. If preferred, for anonymity, it could be put in an envelope and left at the Privacy Officer's desk or it could even be mailed to the Privacy Officer. Obviously, in these latter cases the Privacy Officer will not be able to discuss the alleged infractions, since the submitter is anonymous. However, there are instances where the need for this anonymity is understood and will be respected. But, in all cases, the privacy of the reporter will be paramount.

5. Dealing with Privacy Infractions

The privacy Officer is authorized to investigate any reports regarding alleged breaches of Patient Health Information. It is anticipated that the Privacy Officer will investigate these reports.

In the process of these investigations we expect all staff and physicians to be fully cooperative in helping the Privacy Officer. These investigations will be conducted as discreetly as possible.

Depending upon the severity of the infractions, the Privacy Officer will make recommendations regarding the disposition of these cases.

Our primary goal is to take those actions that will prevent similar infractions from being repeated.

Some cases may result in no negative findings. Others could result in a warning and/or reprimand to the involved individual (s). It is also possible that certain infractions could result in a decision to suspend an individual, without pay, for a designated period. More serious violations of Patient Privacy could result in termination of the individual (s) involved.

6. Mechanism for Dealing with Patient Complaints about Privacy

Desert Mountain OB/GYN is interested in maintaining the privacy of our patients' health information. Obviously, if any patient registers a complaint, regarding what is considered to be a violation of their privacy, this merits careful attention.

Each staff member and physician is expected to determine the severity of the alleged infraction. Different levels of severity merit different actions. Obviously the practice individual, hearing the complaint, will have to use his/her best judgment in dealing with the complaint. Guidelines regarding these complaints have been issued to each employee of Desert Mountain OB/GYN.

Sincerely,
Desert Mountain OB/GYN