

FAMILY HEALTH CENTERS, INC.

SUBJECT: SANCTIONS – HIPAA PRIVACY

MANUAL: COMPLIANCE

PAGE: 1 of 1

POLICY


It is the policy of Family Health Centers, Inc. (FHC) to provide a process for identifying, reporting, resolving and documenting uses or disclosures of Protected Health Information (PHI) that violate FHC's policies and procedures and/or the Health Insurance Portability and Accountability Act (HIPAA) privacy provisions, hereinafter referred to as "inappropriate use or disclosure." FHC shall mitigate known harmful effects resulting from a violation of policies and procedures.

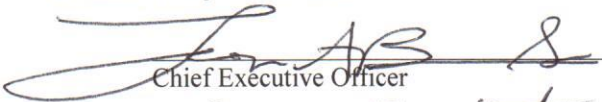
PROCEDURE


1. Individuals or organizations identified as having inappropriately disclosed or used Protected Health Information (PHI) are subject to immediate sanctions. The Compliance Officer and the employee's supervisor, if an employee is responsible for the violation, will consult regarding the appropriate sanction.
2. In cases of intentional or grossly negligent inappropriate use or disclosure, the employee or organization may be separated from FHC. For lesser violations, a less stringent sanction may be applied, such as suspension, demotion or written reprimand. In any case, the nature of the sanction/discipline applied shall be documented.
3. Sanctions and/or discipline shall occur not later than thirty (30) calendar days following receipt of complaint or knowledge of violation, unless unforeseen circumstances require additional time. Such additional time and circumstances shall be documented.
4. Inappropriate use or disclosure of PHI by an employee will be considered in subsequent performance evaluations.


Development Date: February 2003
Effective Date: April 14, 2003
Revised: July 2005
Reviewed: August 2018

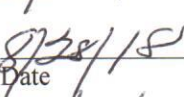
Approved By:

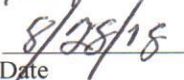

Compliance Officer


Chief Executive Officer


Chairman, Board of Directors


Date


Date


Date