
 <p>Cooper Green Mercy HEALTH SERVICES AUTHORITY AFFILIATE OF UAB HEALTH SYSTEM</p>	<p>POLICIES & PROCEDURES: HIPAA Administration Policy CG#600PVS-0005</p>	
<p>APPROVED: </p>	<p>ISSUED: JUN 24, 2020</p>	
<p>SUBJECT: HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA)</p>	<p>REVISED: 4/2020</p>	<p>REVIEWED:</p>


1. **PURPOSE:** To ensure that CGMHSA implements certain administrative requirements to protect against the wrongful use or disclosure of protected health information (PHI) in compliance with the Health Insurance Portability and Accountability Act ("HIPAA") and Alabama state law.

2. **PHILOSOPHY:** CGMHSA values and promotes business practices among all members of its workforce to provide privacy and security of PHI.

3. **APPLICABILITY:** This policy applies to all CGMHSA employees and services. For purposes of this policy, CGMHSA employees and services shall be collectively referred to as "CGMHSA."

4. **DEFINITIONS:** CGMHSA adopts the definitions set forth in the HIPAA regulations at 45 CFR Parts 160, 162, and 164.

5. **POLICY STATEMENTS:**
 - A. **Personnel Designations**
 1. CGMHSA shall designate a HIPAA Privacy Officer who is responsible for maintaining the policies and procedures regarding health information privacy. The Privacy Officer will communicate and implement these policies and procedures.
 2. CGMHSA shall designate a HIPAA Security Officer who is responsible for maintaining the policies and procedures regarding health information security. The Security Officer will communicate and implement these policies and procedures.
 3. The HIPAA Privacy Officer and the HIPAA Security Officer will work together on issues related to the privacy and security of patient information.
 - B. **Workforce Training**
 1. CGMHSA shall train all members of its workforce on its HIPAA-related policies and procedures.
 2. This training is required for all CGMHSA workforce members. It should be completed within the first 30 days of employment or assignment.
 - a. A procedure will be maintained to follow-up on members of the workforce who are delinquent in completing the required training.
 - b. Successful completion of this training will be documented.
 - C. **Disciplinary Actions**
 1. CGMHSA, through its Human Resources Department, shall apply disciplinary actions against members of the workforce who fail to comply with CGMHSA's HIPAA policies and procedures or applicable laws regarding PHI.
 2. The Human Resources Department will consider all relevant factors in determining the nature and severity of the disciplinary action: the type of violation, the intent of the workforce member at the time of the violation, and the number and frequency of any prior violations. Cumulative

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disciplinary actions may be imposed on an individual who commits more than one violation.

6. REFERENCES: None

7. SCOPE: This policy applies to all CGMHSA employees and services.