**Compliance Program Policy & Procedure Template**

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| **SUBJECT**:  Privacy-Security | **EFFECTIVE DATE**: | **REVISION DATE**: |
| **APPROVAL**: | **DATE**: |  |

**PURPOSE:** To define a process for the handling of medical records or other health or enrollment information and for the reporting of all Medicare or Medicaid Reportable Privacy disclosures to applicable regulatory entities and to patients.

**POLICY**: (‘the Company”) shall abide by the following related to any medical records maintained with respect to Government Program enrollees:

* Abide by all Federal and State laws regarding confidentiality and disclosure of medical records, or other health and enrollment information.
* Safeguard the privacy of any information that identifies a particular enrollee/patient and have procedures that specify:
  + For what purposes the information is used within the organization; and
  + To whom and for what purposes it discloses the information outside the organization.
* Ensure that medical information is released only in accordance with applicable Federal or State law, or under court orders or subpoenas.
* Maintain the records and information in an accurate and timely manner.
* Ensure timely access by enrollees/patients to the records and information that pertain to them.
* Ensure all incidents of reportable disclosures are tracked and reported to the applicable regulatory entity
* Maintain detailed policies and procedures on identifying, tracking and reporting disclosures as required.
* Execute a HIPAA-compliant Business Associate Agreement with all contractors that will have access to Medicare beneficiary protected health information.