

<b>Policy Title:</b> HIPAA Privacy Officer			
<b>Department Responsible:</b> THN Compliance & Integrity	<b>Policy Number:</b> SEC-102	<b>THN's Effective Date:</b> January 1, 2022	<b>Next Review/Revision Date:</b> September 30, 2024
<b>Title of Person Responsible:</b> THN Director of Compliance & Privacy	<b>THN Approval Council:</b> THN Compliance and Privacy Committee	<b>Date Committee Approved:</b> <b>June 9, 2023</b>	<b>Date Approved by THN Board of Managers:</b> <b>August 15, 2023</b>

- I. **Position Title.** HIPAA Privacy Officer.
- II. **Immediate Supervisor.** Practice Manager, manager responsible for compliance, or Board of Directors of Triad HealthCare Network (THN).
- III. **General Purpose.** THN's HIPAA Privacy Officer oversees all ongoing activities related to the development, implementation, maintenance of, and adherence to THN's policies and procedures covering the privacy of, and access to, all patients' protected health information in compliance with federal and state laws and THN's information privacy practices.
- IV. **Policy Development and Implementation.**
  - A. Provides development guidance and assists in the identification, implementation, and maintenance of privacy policies and procedures in coordination with organization management, administration, and/or legal counsel.
  - B. Reviews all system-related information and security plans throughout THN's network to ensure alignment between security and privacy practices and acts as a liaison to the Information Systems Department.
  - C. Develops, reviews, and publishes THN's privacy notice to the general public as required under federal and state law.
  - D. Establishes a mechanism to track access to protected health information within THN to an extent as required by law.
  - E. Establishes and administers a process for receiving, documenting, tracking, investigating, and acting on all complaints concerning THN's privacy policies and procedures.
  - F. Conducts or ensures conduction of initial privacy training and orientation to all employees, volunteers, professional staff, contractors, alliances, business associates, and other appropriate third parties.
- V. **Policy Maintenance.**



- A. Performs initial and periodic risk assessments or “privacy audits” and conducts related ongoing compliance monitoring activities to ensure compliance.
- B. Works with key departments to ensure THN has and maintains appropriate privacy and confidentiality consent, authorization forms, and information notices and materials reflecting current organization and legal practices and requirements.
- C. Participates in the development, implementation, and ongoing compliance monitoring of all trading partners and business associate agreements, to ensure all privacy concerns, requirements, and responsibilities are addressed.
- D. Ensures compliance with privacy practices and consistent application of sanctions for failure to comply with privacy policies for all individuals in THN’s workforce, extended workforce, and for all business associates, in cooperation with Human Resources, the information security officer, administration, and legal counsel as applicable.
- E. Maintains current knowledge of applicable federal and state privacy laws and accreditation standards and monitors advancements in information privacy technologies to ensure organizational adaptation and compliance.
- F. Cooperates with THN for Civil Rights, the HHS, other legal entities, and organization officers in any compliance reviews or investigations.

Date	Reviewed	Revised	Notes
January 1, 2022			Original Publication for DCE
May 2023	X		Reviewed for REACH – no changes