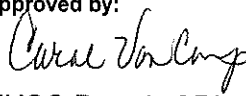


 HAWAII HEALTH SYSTEMS CORPORATION POLICY	Quality Through Compliance	Policy No.: CMP 020A
		Revision No.: N/A
Subject: HIPAA Privacy and Security Policy and Practices Requirements	Issued by: Corporate Compliance	Effective Date: September 20, 2012
	Approved by:  HHSC Board of Directors By: Carol VanCamp Its: Secretary/Treasurer	Supersedes Policy: N/A Page: 1 of 1

Last Review: September 20, 2012. Next Review: September 20, 2015

- I. **PURPOSE:** To establish HHSC's adherence to the intention and definitions in the Health Insurance Portability and Accountability Act (HIPAA) by establishing minimum policies and practices that must exist at the Corporate, regional and facility level as appropriate.
- II. **POLICY:** HHSC will adhere to all HIPAA requirements included in the U.S. Department of Health & Human Services Office of Civil Rights Audit Protocol. The Corporate Office, each HHSC Region, and each individual facility will assess the requirements within the protocol and determine its applicability. If applicable, appropriate level policies will be developed and practices implemented. The Chief Compliance Officer, HHSC Corporate Security Officer, and Regional Compliance Officers will be responsible for periodically assessing the implementation of the policies and procedures of the U.S. Department of Health & Human Services Office of Civil Rights (OCR) Audit Protocol. The HHSC Corporate Office, each HHSC Region, and each HHSC facility will assess the list of requirements in the OCR's Audit Protocol and determine which policies and practices are required for each entity. When deemed necessary by the respective HHSC entity, applicable policies and procedures will be developed.

The Chief Compliance and Privacy Officer, the HHSC Security Officer, and the Regional Compliance Officers shall conduct period reviews to document compliance with the Audit Protocol. Such review results shall be presented to the HHSC Audit and Compliance Committee and subsequently the HHSC Board of Directors.

III. DEFINITIONS:

HIPAA: Broad set of Federal law contained in the Health Insurance Portability and Accountability Act (45 CFR Parts 160, 162, and 164) that govern the transmission of insurance and other information for medical purposes. HIPAA also addresses the privacy requirements and rights for disclosing individually identifiable health information. HIPAA compliance includes the Privacy Rule, the Security Rule, and the Breach Notification Rule.

Audit Protocol: Scope of work developed and announced by the OCR for protocols for documentation of compliance with administrative, physical, and technical standards in the Privacy Rule, the Security Rule and the Breach Notification Rule.

- IV. **APPLICABILITY:** This policy applies to all HHSC facilities and the HHSC Corporate Office.

- V. **AUTHORITY:** 45 CFR Parts 160, 162, and 164. Act 315, Haw. Sess. Laws (2012)