PURPOSE:
To ensure Health Quest Systems, Inc. and its affiliates (“HQ”) Workforce Members understand the requirement to provide a Notice of Privacy Practices to all patients as required by the HIPAA Privacy Rule.

POLICY:
1. HQ entities must provide the Notice of Privacy Practices (Notice) to all patients and make a good faith effort to obtain a written acknowledgment of receipt of the Notice from each patient, or the patient’s Personal Representative, no later than the date of the first service delivery, to the extent practicable. This Notice informs patients how their PHI may be accessed, used and disclosed by HQ, HQ’s duty to protect their PHI, and their rights with respect to their PHI and how to exercise those rights. The Notice will be posted in prominent areas for patients to view. When significant content updates are made to the Notice, copies will be given to patients.

2. In an emergency treatment situation, HQ will provide the Notice as soon as reasonably practicable after the emergency treatment situation. If a written acknowledgment cannot be obtained from the patient, documentation will be made regarding efforts to obtain one and the reasons why it could not be obtained.

3. The Privacy Officer shall ensure appropriate distribution and updating of the Notice. HQ Workforce Members must:
   a. Provide Notice to all new patients.
   b. Attempt to obtain a signed acknowledgement form from the patient and maintain the form in the medical record. If a written acknowledgment cannot be obtained from the patient, documentation will be made regarding efforts to obtain one and the reasons why it could not be obtained.
   c. Document receipt of the Notice in the patient registration system, if applicable.
   d. Forward inquiries on the Notice to the Office of Corporate Compliance, Internal Audit and Privacy.

DEFINITIONS:
See HIPAA Glossary
ENFORCEMENT:
All individuals whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy and related procedure may result in remedial and/or disciplinary action, up to and including termination of any employment or other relationship.

REFERENCES:
45 CFR Section 164.520
HQ 5.2.10 Notice of Privacy Practice Procedure

POLICY HISTORY:
Supersedes: 2/13/2019
Original Implementation Date: 9/08/2008

APPROVAL:

Wayne J. Wozniak
Policy Owner

2/28/10
Date