PURPOSE:
To provide guidelines regarding the use of patients’ Protected Health Information (“PHI”) for Health Quest System’s Inc and its affiliates (“HQ”) for treatment, payment for health care, and health care operations, including quality improvement activities, conducted by, and for, health care providers and health plans, that support treatment and payment.

POLICY:
1. It is the policy of HQ to use PHI for quality performance measurement and improvement in accordance with applicable federal and state law and to assure the confidentiality, privacy, and security of PHI as required by law. The core health care activities of treatment, payment and health care operations are defined in the HIPAA Privacy Rule at 45 CFR 154.501.

2. HQ entities are considered as a single Affiliated Covered Entity as defined by the HIPAA Privacy Rule.

3. Use of PHI for other purposes (e.g., research) is guided by policies relating to those uses.

4. Disclosure of PHI to outside entities is governed by policies relating to these disclosures and must be considered in an accounting of disclosures.

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, Parts 160 and 164
Uses and Disclosures for Treatment, Payment and Healthcare Operations Procedure