

## HIPAA-02: HIPAA Policies and Procedures Policy

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| Effective Date: | 12-01-2015 | Last Revised: | 7-17-2017 |
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### Scope of Policy

This policy governs the establishment and maintenance of policies and procedures for **TCS**. All personnel of **TCS** must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibilities of every member of the workforce.

### Assumptions

- TCS** must comply with HIPAA and the HIPAA implementing regulations, in accordance with the requirements at 45 CFR Parts 160 and 164, as amended.
- Full compliance with HIPAA is mandatory and failure to comply can bring severe sanctions and penalties. Possible sanctions and penalties include, but are not limited to: civil monetary penalties, criminal penalties including prison sentences, and loss of revenue and reputation from negative publicity.

### Policy Statement

- It is the Policy of **TCS** to create and implement appropriate policies and procedures as required by law and as suggested by good business practices and general business ethics. This shall include appropriate Security Policies and Procedures to address evolving security threats.
- All policies and procedures shall be updated and amended as needed or as required by law.
- All policies and procedures shall be distributed to, or made otherwise available to, the entire workforce.
- All policies and procedures shall be regularly maintained and secured, and copies shall be stored offsite with other important business records for safekeeping.
- All members of the workforce are required to read, understand, and comply with this and all other policies and procedures created and implemented by **TCS**.

### Procedures

- TCS** shall create or revise its own HIPAA policies and procedures, consistent with all applicable HIPAA Rules and Regulations as well as with applicable State laws and statutes.
- The Privacy Officer shall assume control of the policies and procedures process. This individual shall report to and shall execute the creation or revision process in a timely manner in compliance with current HIPAA guidelines.
- TCS** shall periodically review and update this manual. Each month, a select number of HIPAA Policies and Procedures will be reviewed on a rotating basis by the agency's HIPAA Committee. All Policies and Procedures will be reviewed at least once annually. Qualified counsel will be engaged as needed to guide or review the policies and procedures creation/revision process, to ensure they address all applicable HIPAA (and other) standards.
- TCS** shall internally publish its HIPAA policies and procedures to all workforce members, and shall provide appropriate training to all members of its workforce on the interpretation and implementation of its policies and procedures.