## Introduction

The Counseling Service's (TCS) intention for publishing this HIPAA Policy Manual is not to impose restrictions that are contrary to the company's established culture of openness, trust and integrity. TCS is committed to protecting employees, patients, partners and itself from illegal or damaging actions by individuals, either knowingly or unknowingly.

Effective HIPAA security is a team effort involving the participation and support of every TCS employee and affiliate that interacts with information and/or information systems. It is the responsibility of every computer user to know these guidelines, and to conduct their activities accordingly.

Any time that protected health information (PHI) is referenced in this policy, it is referencing the HIPAA Privacy Rule; when electronic protected health information (EPHI) is referenced in this policy, it is referencing the HIPAA Security Rule.

## Scope

This HIPAA Policy Manual is applicable to the entire TCS organization and any outsourced service providers involved in TCS operational support.

## **Compliance and Enforcement**

All TCS supervisors are responsible for enforcing this policy. Employees who violate this policy are subject to discipline up to and including termination in accordance with TCS's Sanction Policy.