



Policies and Procedures

Policy Title: HIPAA Privacy Officer Job Description			
Department Responsible: THN Compliance and Integrity	Policy Number: THN-CP-109-0919- HIPAA Privacy Officer Job Description	Effective Date: September 30, 2019	Next Review/Revision Date: September 30, 2020
Title of Person Responsible: THN Compliance Officer	Approval Council: Board of Managers		Date Adopted by THN Compliance & Integrity:

Position Title: Privacy Officer

Immediate Supervisor: Practice Manager, manager responsible for compliance, or Board of Directors of Triad HealthCare Network

General Purpose: The Privacy Officer oversees all ongoing activities related to the development, implementation, maintenance of, and adherence to Triad HealthCare Network’s policies and procedures covering the privacy of, and access to, all patients’ protected health information in compliance with federal and state laws and Triad HealthCare Network’s information privacy practices.

Responsibilities:

Policy Development and Implementation:

- Provides development guidance and assists in the identification, implementation, and maintenance of privacy policies and procedures in coordination with organization management, administration and/or legal counsel.
- Reviews all system-related information, security plans throughout Triad HealthCare Network’s network to ensure alignment between security and privacy practices, and acts as a liaison to the information systems department.
- Develops, reviews, and publishes Triad HealthCare Network’s privacy notice to general public as required under federal and state law.



- Establishes a mechanism to track access to protected health information within Triad HealthCare Network to an extent as required by law.
- Establishes and administers a process for receiving, documenting, tracking, investigating, and taking action on all complaints concerning Triad HealthCare Network’s privacy policies and procedures.
- Conducts or ensures conduction of initial privacy training and orientation to all employees, volunteers, professional staff, contractors, alliances, business associates, and other appropriate third parties.

Policy Maintenance:

- Performs initial and periodic risk assessments or “privacy audits” and conducts related ongoing compliance monitoring activities to ensure compliance.
- Works with key departments to ensure Triad HealthCare Network has and maintains appropriate privacy and confidentiality consent, authorization forms, and information notices and materials reflecting current organization and legal practices and requirements.
- Participates in the development, implementation, and ongoing compliance monitoring of all trading partner and business associate agreements, to ensure all privacy concerns, requirements, and responsibilities are addressed.
- Ensures compliance with privacy practices and consistent application of sanctions for failure to comply with privacy policies for all individuals in Triad HealthCare Network’s workforce, extended workforce, and for all business associates, in cooperation with Human Resources, the information security officer, administration, and legal counsel as applicable.
- Maintains current knowledge of applicable federal and state privacy laws and accreditation standards, and monitors advancements in information privacy technologies to ensure organizational adaptation and compliance.
- Cooperates with Triad HealthCare Network for Civil Rights, the HHS, other legal entities, and organization officers in any compliance reviews or investigations.

PREVIOUS REVISION/REVIEW DATES:

<i>Date</i>	<i>Reviewed</i>	<i>Revised</i>	<i>Notes</i>