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Sanctions for Inappropriate Release of Protected Health Information Policy 5021

Purpose:

The purpose of this policy is to define expectations regarding the protection of Protected Health Information (PHI) by Bullhook Community Health Center's (BCHC) workforce, and to verify that sanctions may be applied when PHI has been released to individuals or organizations who should not have access to the PHI.

Scope:

The scope of this policy is all BCHC workforce members, which include employees, contractors, subcontractors, temporary employees, students and interns. PHI in electronic or paper form is included in this policy.

Policy:

It is the policy of BCHC to protect PHI, and to implement sanctions against workforce members when a workforce member releases PHI to individuals or organizations that are not authorized to have access to the PHI. An investigation will be conducted by the CEO and Compliance Officer's to determine the facts and circumstances of the inappropriate release of PHI prior to any sanctions being applied. The BOARD will be informed of the investigation.

Sanctions:

Workforce members who give PHI to individuals or organizations that should not have access to that information will be subject to sanctions as follows:

- The first time that a workforce member releases PHI to an individual or organization that is not authorized to have that access, the workforce member may be subject to disciplinary action, up to and including termination of employment, depending on the facts and circumstances of the situation.
- The second time that a workforce member releases PHI to an individual or organization that is not authorized to have that access; the workforce member may be terminated, depending on the facts and circumstances of the situation.

Policy Number: 5021



BULLHOOK

Community Health Center


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References:

1. HIPAA Security Regulation
2. BCHC Employee Handbook
3. BCHC Security Incident Response Policy 5020
4. BCHC Notification of Breach of Unsecured Protected Health Information Policy 5006

 _____ Date: 2/9/16

CHIEF EXECUTIVE OFFICER

 _____ Date: 2/8/16

CHAIR, BOARD OF DIRECTORS

Date first adopted	06/24/2015
Date Revised/QI Board approval	06/24/2015
New date adopted/Board of Directors approval	07/13/2015