

POLICY INFORMATION

Policy Title: Chief Privacy Officer Policy and Procedure

Departmental Owner: Chief Compliance, Audit, and Privacy Officer

Version Effective Date: 2/28/24

Last Reviewed: 2/28/24

SCOPE

This policy applies to the following individuals and/or groups:

All of the below categories

All Employees CT Employees NY Employees Remote Employees Contractors Volunteers Students/Interns Vendors

This policy applies to all above listed Nuvance Health workforce members including but not limited to the following locations:

All of the below entities

Nuvance Health Systems

Danbury Hospital (including New Milford Hospital Campus)

Northern Dutchess Hospital

Norwalk Hospital

Putnam Hospital

Sharon Hospital

Vassar Brothers Medical Center

Health Quest Systems, Inc. "(HQSI)"

Health Quest Home Care, Inc

Hudson Valley Cardiovascular Practice, P.C. (aka The Heart Center) ("HVCP")

Other HQSI-affiliated Entities Not Listed

Western Connecticut Home Care, Inc ("WCHN")

Western Connecticut Health Network Physician Hospital Organization ACO, Inc.

Western Connecticut Home Care, Inc

Other WCHN-affiliated Entities Not Listed

Nuvance Health Medical Practices (NHMP PC, NHMP CT, ENYMS & HVCP)

POLICY STATEMENT/PURPOSE

To ensure that Nuvance Health and its affiliates ("Nuvance") implement certain administrative requirements to protect against the wrongful use or disclosure of Protected Health Information ("PHI") in compliance with HIPAA. The HIPAA Rule requires that a Chief Privacy Officer is designated for the organization, is at an executive level, and is charged with developing and implementing policies and procedures designed to protect patient data from unauthorized access.

DEFINITIONS

See HIPAA Glossary

POLICY

1. It is the policy of Nuvance to designate a Chief Privacy Officer to ensure that Nuvance policies and practices secure the PHI of all its patients. The Chief Privacy Officer may designate associate privacy officers to assist with compliance. Nuvance has designated the Chief Privacy Officer role to be served by the Chief Compliance, Audit, and Privacy Officer.
2. The Chief Privacy Officer is responsible for the organization's Privacy Program including but not limited to daily operations of the program, development, implementation, and maintenance of policies and procedures, monitoring program compliance, investigation and tracking of incidents and breaches and insuring patients' rights in compliance with federal and state laws. The Privacy Officer is responsible for ensuring the confidentiality of all patient

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Revision Dates: 2/28/24

Supersedes: HQ 5.2.03 Chief Privacy Officer Policy;
HQ 5.2.03 Chief Privacy Officer Procedure

confidential healthcare information and is responsible for developing and implementing all policies and procedures effecting patient confidential healthcare information.

3. The name, location and telephone number of the Chief Privacy Officer is to be posted throughout the organization in the event that a patient elects to file a complaint.
4. The Privacy Officer is responsible for documenting, investigating, and responding to all patient complaints regarding confidential healthcare information.

PROCEDURE

Nuvance Health will have a high level designated Chief Privacy Officer to oversee the implementation aspects of the privacy activities to ensure full and timely compliance with all applicable federal and state laws and regulations of a comprehensive Privacy Program.

1. Nuvance shall designate a Chief Privacy Officer, who is an executive level employee with the following duties under their purview:
 - Keeping up to date on Federal and State privacy laws
 - Creating, posting and distributing the Notice of Privacy Practices (“NPP”) and ensuring there is a practice in place to maintain records of each patient’s acknowledgement of receiving the NPP
 - Meeting requests from patients for access to their health records - Meeting requests from patients to correct or change their health records
 - Consider requests for added protection for, or confidential communications of, particularly sensitive health information - Provide information to patients or staff who have questions about HIPAA and their privacy protections
 - Handle complaints from patients or staff about possible HIPAA violations
 - Develop and implement HIPAA training for staff to foster their awareness of information privacy
 - Develop, implement and monitor Business Associate Agreements to ensure privacy concerns, responsibilities and requirements are addressed
 - Cooperate with HHS Office of Civil Rights and other entities in any compliance reviews or investigations
2. Nuvance shall maintain written or electronic documentation of its Chief Privacy Officer designation.
3. The Chief Privacy Officer shall maintain and oversee the organization's Privacy Program including but not limited to daily operations of the program, development, implementation, and maintenance of policies and procedures, training, monitoring program compliance, investigation and tracking of incidents and breaches and insuring patients' rights in compliance with federal and state laws. The Chief Privacy Officer, or designee(s) shall serve as the contact person(s) for receiving complaints and providing further information about all matters related to HIPAA privacy.
4. The name, location, and telephone number of the Chief Privacy Officer and/or designee(s) shall be posted throughout the organization.

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 §164.530(a) and (b)
- 45 CFR §164.530(j)

APPROVAL

DocuSigned by:

Jared B Gaynor

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Signature

Date