

General Policy Description: HIPAA PRIVACY AND SECURITY POLICY

1. Introduction This policy outlines the privacy and security measures implemented by Desert Spine & Sports Physicians comply with the Health Insurance Portability and Accountability Act (HIPAA) and safeguard protected health information (PHI). It establishes guidelines for the appropriate use, access, disclosure, and protection of PHI by all members of our workforce.
2. Definitions 2.1. Protected Health Information (PHI): Individually identifiable health information transmitted or maintained by electronic media or in any other form. 2.2. Workforce: All employees, contractors, volunteers, and any other personnel associated with Desert Spine & Sports Physicians
3. Privacy Officer Desert Spine & Sports Physicians designates a Privacy Officer responsible for the development, implementation, and maintenance of policies and procedures related to the privacy and security of PHI. The Privacy Officer will also address any privacy-related concerns or complaints from patients.
4. Use and Disclosure of PHI 4.1. Minimum Necessary Standard: PHI will only be used, accessed, or disclosed on a need-to-know basis, limiting the amount of PHI to the minimum necessary to accomplish the intended purpose. 4.2. Treatment, Payment, and Healthcare Operations: PHI may be used and disclosed for treatment, payment, and healthcare operations as permitted by HIPAA regulations. 4.3. Authorization: PHI will not be disclosed to any individual or organization without obtaining a valid authorization from the patient, except as permitted or required by law. 4.4. Business Associates: Business associates must sign a written agreement ensuring the safeguarding of PHI they receive, create, maintain, or transmit on behalf of Desert Spine & Sports Physicians. 4.5. Marketing and Fundraising: PHI will not be used for marketing or fundraising purposes without obtaining the patient's written authorization.
5. Individual Rights 5.1. Notice of Privacy Practices: Desert Spine & Sports Physicians will provide patients with a Notice of Privacy Practices that explains their rights regarding their PHI, including how their information is used, disclosed, and protected. 5.2. Access to PHI: Patients have the right to access and obtain copies of their PHI maintained by Desert Spine & Sports Physicians, subject to certain limitations and fees as permitted by law. 5.3. Amendment of PHI: Patients have the right to request the amendment of their PHI if they believe it is inaccurate or incomplete. Desert Spine & Sports Physicians will review and respond to such requests in accordance with HIPAA regulations. 5.4. Accounting of Disclosures: Desert Spine & Sports Physicians will provide patients with an accounting of certain disclosures of their PHI as required by HIPAA regulations.
6. Security Safeguards 6.1. Risk Assessment: Desert Spine & Sports Physicians will conduct periodic risk assessments to identify potential vulnerabilities and implement appropriate safeguards to protect against reasonably anticipated threats or hazards to the security of PHI. 6.2. Physical Security: Appropriate physical safeguards will be implemented to restrict access to areas where PHI is stored, such as locked cabinets, secure rooms, and controlled access to electronic systems. 6.3. Technical Security: Desert Spine & Sports Physicians will utilize secure computer systems, strong access controls, encryption, and other measures to protect electronic PHI from

unauthorized access or disclosure. 6.4. Training and Awareness: All members of the workforce will receive regular training on HIPAA regulations, the privacy and security policies, and their responsibilities to safeguard PHI. 6.5. Incident Response: Desert Spine & Sports Physicians will establish an incident response plan to address any unauthorized access.

As of July 2023, the following individuals have been designated:

Security Officer: Joe Carlon, President (jcarlon@dsspaz.com)

Privacy Officer: Kathryn Meloy, Practice Manager (kmeloy@dssapaz.com)

As of July 2023, the following email address has been established to allow employees and other individuals to report any compliance related issues to the management at Desert Spine & Sports Physicians.

compliance@dsspaz.com

Security Officer and Privacy Officer will meet no less than twice per year to review policies and procedures and address any known or reported deficiencies. Any incident reporting or policy updates will be reported and filed in the primary Compliance Folder kept by the management team.