 <p>Heritage Provider Network & Affiliated Medical Groups</p>	Program: HIPAA Compliance			
	Policy No.	Effective Date: 01/01/2012	Page - 1 -	
	Authored by: Compliance Sub Committee	Date: 01/01/2012	Revised by: Sandy Finley	Date: 02/02/2015
	Approved by: Compliance Committee	Date: 02/02/2015		
Title of Policy: HIPAA and HITECH Training for Staff				

PURPOSE:

To ensure that all employees of Heritage Provider Network and its Affiliated Medical Groups (HPN) are properly educated and trained according to the requirements of the Heritage Compliance Program and according to HIPAA and HITECH regulations.

POLICY:

The Compliance Committee makes available and ensures that proper education and training of Corporate Officers, Directors, employees, medical staff and Physicians are conducted annually. The Compliance Plan requires that all individuals complete training that addresses HPN's Compliance Plan. Such training includes HIPAA Compliance, Sexual Harassment, Fraud, Waste and Abuse, Standards of Conduct and Injury & Illness Prevention Program. HPN also requires training of all contractors, subcontractors, agents and other persons who provide patient care or who perform billing, coding or claims submission functions on behalf of HPN. HPN has developed and implemented policies and procedures specific to the training responsibilities and requirements. Training presentations will be modified as needed to meet any regulatory changes or changes in company policies and procedures.


RESPONSIBILITY:

All employees of Heritage Provider Network and its Affiliated Medical Groups.

PROCEDURES:

To ensure that all employees receive the proper education and training the following training frequencies are:

1. Training of all of the above during New Hire Orientation;
2. Annually
3. As deemed appropriate by job functionality
4. As deemed necessary by the group Compliance Officer and/or Human Resources for disciplinary reasons.
5. Records of Compliance training will be maintained by Human Resources. These records will consist of the following information:

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- a. Dates of training
 - b. Attendance logs
 - c. Topic of training
 - d. Scores
 - e. Sign Certifications
6. Training will consist of various formats including but not limited to:
- a. Video
 - b. PowerPoint
 - c. On-Line Presentations
 - d. Classroom, etc.