



COMPLIANCE NEWSLETTER

Heritage Provider Network *Volume 8, Issue 2*

Take the Compliance Newsletter Survey!

<https://www.surveymonkey.com/r/Q2Compliance2021>

HIPAA Compliance: Right of Access

Providing patients with access to their health information is fundamental in empowering them to make informed health care decisions and in obtaining better health care outcomes. The [HIPAA Privacy Rule](#) requires covered entities (such as HPN) to provide patients with access to their protected health information within 30 days of the request.

The Office of Civil Rights (OCR) reported that patients' right of access to their health records was the largest category of complaints made in 2020.

As a response, the OCR has conducted investigations related to these complaints and has issued 19 enforcement actions on providers who had not provided patients' access to their health records within 30 days of their request.

The OCR will continue investigating and issuing enforcements on this matter; so it is imperative that we remain vigilant in this area.

The requirements for adhering to the Right of Access initiative may be found in HPN's CMP-PV-009 Release of Medical Information policy and on the HHS website at: <https://www.hhs.gov/hipaa/for-professionals/privacy/guidance/access/index.html>

Compliance and Corrective Actions

HPN and its affiliated Medical Groups (HPN) count on and expect you (employees, FDRs, and vendors) to uphold HPN's Compliance Plan/Standards of Conduct and policies and procedures.

One part of compliance is reporting concerns/potential issues promptly. Each concern/issue is investigated by the Compliance Officer or designee. If during the investigation it is determined that a violation has occurred, HPN will issue corrective actions as appropriate, including disciplinary actions such as:

- Verbal Warning
- Written Warning
- Suspension
- Termination
- Restitution

Some violations that could likely result in disciplinary actions, include:

- Falsifying documents
- Inappropriately accessing confidential information
- Lying or failing to fully cooperate in investigations
- Not reporting known/suspected violations
- Inappropriate use or disclosure of confidential or proprietary information

Together with your commitment to compliance, we can create and sustain a culture of doing the right thing. If you have any questions, please reach out to your supervisor, HR, or Compliance Officer.

REPORT!

FRAUD, WASTE, ABUSE & NON-COMPLIANCE

- ♦ Reports are kept confidential to the extent possible and may be made anonymously.
- ♦ Report without fear of reprisal or any other penalty, including retaliation or intimidation.
- ♦ Reports may be made 24/7, to your Compliance Officer through the Compliance Confidential Hotline, by email, or by mail.

Refer to CMP-GN-006 *Whistleblower Protection* policy.

Corporate Compliance Officer: Ralph Oyaga | royaga@heritagemed.com

Hotline: 855-625-7894 | 44469 10th St W, Lancaster, CA 93534

Heritage Provider Network's Group Compliance Officers

ADOC/LMG/RMG	Jeff Baron	jbaron@regalmed.com
BFMC/CCPN	Melissa Winters	mwinters@bfmc.com
DOHC/AZPC	Ryan Galli	ryan.galli@mydohc.com
HDMG	Thomas Viall	tviall@hdmg.net
HSMG	Sherry Connelly	sconnelly@sierramedicalgroup.com
HVVMG	Denise Rock	drock@hvvmg.com