

SEPA Labs	Policy & Procedure HIPAA / PRIVACY SANCTIONS	FUNCTION
		NUMBER 4c
		PRIOR ISSUE
		EFFECTIVE DATE January 1, 2014

PURPOSE

To ensure there are appropriate sanctions that will be applied to employees who violate the requirements of the HIPAA Privacy Rule and/or SEPA Labs’s HIPAA privacy policies and procedures.

POLICY

It is the policy of this Facility to discipline employees who fail to comply with SEPA Labs’s policies and procedures regarding HIPAA.

PROCEDURE

1. When a concern arises regarding a possible violation of HIPAA or SEPA Labs’s policies or procedures related to HIPAA, SEPA Labs Privacy Official shall begin an investigation promptly. (See the Policy “Complaints” regarding conducting an investigation.)
2. If, at the conclusion of the investigation, it is found that a violation of SEPA Labs’s policy or procedure has occurred, the employee involved shall be disciplined in accordance with the severity of the violation and SEPA Labs’s disciplinary policy. Violations can be classified according to intent such as:
 - a. Level I Violations are those made accidentally or due to a lack of education.
 - b. Level II Violations are serious violations that are found to show purposeful disregard of Facility policy.
3. SEPA Labs Privacy Official shall review the circumstances surrounding any substantiated violation and take appropriate action to mitigate, to the extent possible, any harmful effects of the violation.
4. Documentation from the investigation shall be given to SEPA Labs Privacy Official to be maintained as a part of SEPA Labs’s HIPAA documentation and retained for six years.
5. The disciplinary action report documenting the employee’s violation shall be placed in the employee’s personnel file as well as a copy provided to SEPA Labs Privacy Official.

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