Overview of APS’ HIPAA and Privacy Policies.

APS is committed to ensuring that privacy practices regarding individually identifiable health information comply with industry best practices, covenants given to its clients and, as applicable, all federal and state laws and regulations including but not limited to the Standards for Privacy of Individually Identifiable Health Information promulgated pursuant to HIPAA. Consequently, APS is committed to maintaining an administrative structure, reporting procedures, due diligence procedures, training programs and other methodologies of an effective compliance program relative to the use and disclosure of its customers’ protected health information (PHI). Accordingly, APS is in compliance with all applicable federal and state laws and regulations as more particularly, but not exhaustively, set forth below.

APS’ Privacy Officer has the primary responsibility for ensuring that APS’ privacy policies and procedures are accurate and, as appropriate, are integrated into the operations of the Business Units. This includes, but is not limited to, arranging for responses to all APS workforce (employees and staff including temporary employees and contractors) questions concerning privacy issues; receiving, documenting, and taking action in response to any complaints made by customers, the APS workforce or any other individuals regarding APS’ privacy practices and procedures; developing training programs and materials that educate the APS workforce on the policies and procedures for safeguarding the privacy of PHI and ensuring 100% compliance therewith; overseeing and managing all activities related to the development, implementation, application, maintenance of and compliance with policies, procedures and standards governing, privacy, confidentiality and security of all individually identifiable health information in compliance with HIPAA, the Department of Health and Human Services (DHHS) regulations implementing HIPAA, particularly HIPAA privacy regulations, and other state and federal laws, professional ethics, and accreditation standards protecting the confidentiality and privacy of individuals and their health and other information such as financial information; maintaining the accuracy of APS’ privacy policies, including reviewing federal and state laws and regulations and changing the APS policies and procedures as necessary and appropriate to comply with changes in the law; and developing mechanisms to limit access to PHI, processes to review requests to use PHI and identify unnecessary PHI collection.