

BUTLER COUNTY

Policy Title:	HIPAA - Progressive Discipline Policy		
Policy Number:	HIPAA -C-0015	Effective Date:	04/01/03
Purpose:	This policy sets forth a set of guidelines for a progressive discipline process to be followed when an employee evidences improper adherence to Butler County's policies related to the use and disclosure of PHI.		
Regulation Reference:	Health Insurance Portability and Accountability Act of 1996		

Policy

Progressive discipline is an effective means of correcting inappropriate workforce member behavior and will be utilized when workforce members engage in behavior violative of a client's privacy rights and Butler County's HIPAA privacy and security policies.

Supervisors are responsible for accurate and timely documentation of inappropriate behaviors or performance issues. Progressive discipline will be used consistently. Workforce members will be informed of their expectations regarding confidentiality and HIPAA requirements through HIPAA confidentiality training. The employees will be informed of Butler County's policies and procedures regarding HIPAA and thereby be informed of:

- What is expected behavior and the HIPAA performance standards
- When they are not meeting these expectations
- What must be done to correct the inappropriate behavior and an improvement plan with a time line for its accomplishment
- Consequences if improvement does not occur

The progressive discipline process is meant to assist the workforce member in recognizing the seriousness of their behavior and encouraging their commitment to changing these behaviors. In many situations, informal counseling will be utilized by the supervisor after consultation, as appropriate with Human Resources, and the Privacy Officer or Security Officer to resolve issues prior to the formal corrective action process. The Privacy Officer or Security Officer should be consulted to determine that a particular behavior did in fact violate HIPAA or a HIPAA policy. The Privacy Officer or Security Officer will also thereby determine if the behavior in question must be reported as a HIPAA violation.

An informal counseling session is used by management as a reminder to the workforce member of the policies and practices. Supervisors can utilize informal counseling to explain the HIPAA performance expectations of the job to the

Hipaa Policy And Procedure Manual For Pharmacies

Lourdes M. Cuellar,Diane B. Ginsburg



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Table of Contents Hipaa Policy And Procedure Manual For Pharmacies

1. Understanding the eBook Hipaa Policy And Procedure Manual For Pharmacies
 - The Rise of Digital Reading Hipaa Policy And Procedure Manual For Pharmacies
 - Advantages of eBooks Over Traditional Books
2. Identifying Hipaa Policy And Procedure Manual For Pharmacies
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Hipaa Policy And Procedure Manual For Pharmacies
 - User-Friendly Interface
4. Exploring eBook Recommendations from Hipaa Policy And Procedure Manual For Pharmacies

- Personalized Recommendations
- Hipaa Policy And Procedure Manual For Pharmacies User Reviews and Ratings
- Hipaa Policy And Procedure Manual For Pharmacies and Bestseller Lists
- 5. Accessing Hipaa Policy And Procedure Manual For Pharmacies Free and Paid eBooks
 - Hipaa Policy And Procedure Manual For Pharmacies Public Domain eBooks
 - Hipaa Policy And Procedure Manual For Pharmacies eBook Subscription Services
 - Hipaa Policy And Procedure Manual For Pharmacies Budget-Friendly Options
- 6. Navigating Hipaa Policy And Procedure Manual For Pharmacies eBook Formats
 - ePub, PDF, MOBI, and More
 - Hipaa Policy And Procedure Manual For Pharmacies Compatibility with Devices
 - Hipaa Policy And Procedure Manual For Pharmacies Enhanced eBook Features
- 7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Hipaa Policy And Procedure Manual For Pharmacies
 - Highlighting and Note-Taking Hipaa Policy And Procedure Manual For Pharmacies
 - Interactive Elements Hipaa Policy And Procedure Manual For Pharmacies
- 8. Staying Engaged with Hipaa Policy And Procedure Manual For Pharmacies
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Hipaa Policy And Procedure Manual For Pharmacies
- 9. Balancing eBooks and Physical Books Hipaa Policy And Procedure Manual For Pharmacies
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Hipaa Policy And Procedure Manual For Pharmacies
- 10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
- 11. Cultivating a Reading Routine Hipaa Policy And Procedure Manual For Pharmacies
 - Setting Reading Goals Hipaa Policy And Procedure Manual For Pharmacies
 - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Hipaa Policy And Procedure Manual For Pharmacies

- Fact-Checking eBook Content of Hipaa Policy And Procedure Manual For Pharmacies
- Distinguishing Credible Sources

13. Promoting Lifelong Learning

- Utilizing eBooks for Skill Development
- Exploring Educational eBooks

14. Embracing eBook Trends

- Integration of Multimedia Elements
- Interactive and Gamified eBooks

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