



# **TotalWellness**

## **HIPAA Compliance**

### **Policies and Procedures Summary**

Last Update: March 18, 2016  
Reviewed: April 3, 2024

**PURPOSE:** The purpose of this document is to provide a summary of the policies included in the Vaccination Services of America, Inc. d/b/a TotalWellness (TW) HIPAA Compliance Policies and Procedures Manual. The information contained in this summary is written in plain language and does not match the exact language in the HIPAA Compliance Policies and Procedures Manual.

**POLICY SUMMARY:**

1. TW will provide a copy of the TW Notice of Privacy Practices to all participants and require that participants authorize, through a signature, that they have had the opportunity to review the notice. The Notice will be available through the following channels:
  - a. Onsite at vaccination and screening events
  - b. On the TW website (<https://www.totalwellnesshealth.com/privacy-notice/>)
  - c. On the TW appointment scheduling tool Register My Time
  - d. On the TW wellness portal
2. TW will only use and disclose participant protected health information (PHI) as permitted by our policies or with authorization.
  - a. Participant PHI and authorization that they have the opportunity to read our Notice will be maintained for 6 year (Example: All consent forms will be kept for 6 years).
3. TW will utilize the minimum necessary rule when using and disclosing participant PHI.
4. TW will protect participant PHI and electronic protected health information (ePHI).
  - a. Technical, physical, and administrative safeguards must be in place to protect PHI and ePHI.
5. TW will receive authorization, via a participant signature, prior to disclosing participant PHI.
6. TW may release PHI without authorization if the situation falls within the National Priority exceptions (Examples: required by law, abuse or neglect, serious threat to health or safety).
7. TW will execute Business Associate Agreements with Business Associates prior to disclosing participant PHI to the Business Associate.
8. TW marketing will comply with all TW regulations and policies.
9. Participants have the right to request additional restrictions on the use and/or disclosure of their PHI.
10. Participants can request copies of their PHI.
11. TW can amend participant's PHI if in compliance with the regulations.
12. If a participant requests, TW will tell the participant whom their PHI was disclosed to.
13. TW will notify proper parties, including the participants, if a breach occurs.
  - a. If a breach occurs affecting 500 or more individuals TW will notify the media and the Secretary of Health and Human Services.
  - b. If a breach occurs affecting fewer than 500 individuals the breach will be documented in a log. The log of breaches will be submitted to the Secretary of Health and Human Services annually.

14. TW will train all employees and independent contractors on our HIPAA policies and procedures.
  - a. Trainings will be conducted annually.
  - b. TW employees and TW independent contractors must sign acknowledgement that HIPAA training was completed, the policies were understood, and they agree to abide by the policies.
15. TW will appropriately respond to participant complaints.
16. TW will enforce the privacy and security policies with sanctions and possible termination for policy violations.
17. TW HIPAA compliance policies and procedures will be reviewed annually.