



Privacy & Confidentiality Policy

All employees of Anders Group, corporate and clinical, are expected to adhere to policies with regard to Health Insurance Portability and Accountability Act (HIPAA) regulations and confidentiality requirements set forth by Anders Group and any facility the employee is assigned.

Protected health information (PHI) is defined as any information, including demographic information, collected from an individual that (a) is created or received by a health care provider, health plan, employer or health care clearing house; and (b) relates to the past, present, or future physical or mental health or condition of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision for health care to an individual and identifies the individual or with respect to which there is a reasonable basis to believe that the information can be used to identify the individual.

It is the policy of Anders Group that all employees comply with the following:

1. Will maintain and protect the privacy of all business information related to Anders Group and any healthcare facility.
2. Will maintain and protect the privacy of all protected health information relating to employees and/or patients.
3. Will follow the HIPAA policy and procedure as defined by Anders Group and, for clinical employees, by each individual health care facility the healthcare provider may be assign during employment with Anders Group.
4. Will not remove any employee information from the company or patient information from the healthcare facility.
5. Will not misuse confidential information and will only access information that is necessary for the employee to do his/her job. Confidential information, including protected health information, will not be used or disclosed in any manner (verbal, written, electronic) unless required to do so in order to provide appropriate and necessary care to the patient or as necessary to secure an assignment for a clinical employee.
6. Will not share any employee or patient protected health information with any corporate employee of Anders Group or other clinical staff employed by Anders Group unless it is a necessary part of the job.
7. Will not share, alter, or destroy any confidential information unless it is a necessary part of the job. If it is necessary, the employee will follow the correct procedure as directed by Anders Group management or management at the assigned facility.
8. Will keep any computer password secret and will not share it. The employee is responsible to protect his/her password or other access to confidential information. The employee understands that use of an electronic system at Anders Group or an assigned facility may be periodically monitored and audited to ensure compliance with the law.
9. Will only print or download information from any computer system with it is necessary for legitimate work related purposes. The employee is responsible for this information until it is properly disposed of or filed.
10. Will immediately report to appropriate management personnel at the company or assigned facility if the employee suspects anyone is misusing confidential information or is using his/her password. Anders Group will not tolerate any retaliation against the employee for making such a report.
11. Will acknowledge that any confidential information learned on the job does not belong to the employee and he/she has no right or ownership to it. Access to confidential information may be removed by Anders Group or the facility the employee is assigned to at any time.
12. Will, upon termination of employment with Anders Group or of assignment with any healthcare facility, promptly return any Anders Group or facility documents or data containing Anders Group or that facility's confidential information or data that is in the employee's possession or control.

Failure to comply with each term in this policy may result in disciplinary action up to and including termination of assignment and/or employment with Anders Group.