



## ESSENT HEALTHCARE, INC.

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<b>Section:</b>	<b>Information Technology</b>	<b>Effective Date:</b>	<b>4/20/05</b>
<b>Subject:</b>	<b>Security Awareness Program</b>	<b>Revision Date:</b>	<b>4/20/05</b>
<b>Policy #:</b>	<b>ISP-013</b>	<b>Review Date:</b>	<b>6/26/08</b>
<b>Responsible Party:</b>	<b>Chief Information Officer</b>	<b>Revision #:</b>	<b>1</b>

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**Scope:**

This policy applies to all workforce members of Essent Healthcare, Inc. (“Essent”).

**Purpose:**

This policy outlines the requirements for an ongoing security awareness program to prevent unauthorized access to Electronic Protected Health Information (ePHI).

**Policy:**

It is the policy of Essent to maintain an effective and ongoing security awareness program to remind employees of the importance of protecting all PHI (whether electronic or otherwise) and of their responsibility to comply with all Essent policy related to the confidentiality, availability, and integrity of ePHI. The security awareness program is comprised of several elements as described below.

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**Procedures:**

1. The Corporate Compliance Officer shall maintain an effective HIPAA compliance program as a supplement to the Corporate Compliance Program.
2. The HIPAA compliance program shall include an ongoing security awareness program.
3. The security awareness program shall be comprised of the following:
  - a. Mandatory HIPAA compliance training will be provided to all workforce members on an annual basis.
  - b. Security is to be emphasized during new hire orientation training and new system user training.
  - c. Confidentiality statements will be obtained from all employees before they are given access to Essent systems. This statement serves as a reminder to employees and documents that they understand their responsibility to maintain confidentiality.
  - d. Ongoing updates will be provided to any workforce member who is impacted by a new or revised policy.
  - e. Security reminders (posters, stickers, etc...) will be placed in locations to remind employees to maintain confidentiality.
  - f. Security reminders will be programmed to appear on workstation monitors at login



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(where feasible).

- g. We will maintain a hotline for security questions and/or concerns. We will utilize the compliance reporting hotline (1-800-472-8868) for this purpose.
- h. All workforce members will be reminded to use the hotline as part of their annual education.

### **References:**

HIPAA Subpart C

OIG Compliance Guidance for Hospitals