

**NETWORK STAFFING RESOURCES, INC.
HIPAA PRIVACY TRAINING MODULE**

INSTRUCTIONS:

Please read pages 1 and 2. If you have questions, call our office {800.987.8233} or email mdavis@networkstaffing.us. If there are no questions, please sign the Certification page and return to the office. This training and agreement is required and mandatory.

1. **What is HIPAA?** The Health Insurance Portability and Accountability Act of 1996 (HIPAA) established a mandatory procedure for enacting federal legislation and regulations to protect, among other things, the privacy of “individually identifiable health information” (“PHI”). HIPAA also established the wrongful use or disclosure of PHI as a felony punishable by civil and criminal penalties.
2. **What are the HIPAA Privacy Regulations?** The Department of Health and Human Services ("HHS") published the final HIPAA Privacy Regulations ("Regulations") during August 2002. These Regulations, which go into effect on April 14, 2003 for most covered entities, will establish certain minimum standards that will protect the privacy and security of individually identifiable health information ("PHI") from state to state.
3. **What type of information qualifies as PHI protected by the Privacy Regulations?** Any individually identifiable health information concerning health status, treatment or payment that is transmitted or maintained by a Covered Entity, using any form or medium (i.e., the spoken word, paper documents, facsimiles, electronic transmissions), is protected. Certain education and employer records are excluded.
4. **Who qualifies as a Covered Entity?** The term “Covered Entity” means any person or entity who qualifies as a (a) health care provider that submits at least one of the "standard" HIPAA transactions electronically (e.g., claim for payment); (b) group health plan; or (c) health care clearinghouse under the Regulations. For purposes of Network Staffing assignments, our health care provider clients qualify as a covered entity under the final Regulations.
5. **Under what circumstances will these Regulations apply to Network Staffing Resources personnel working for one of our health care clients?** Network Staffing Resources qualifies as a "Business Associate" to our health care clients under the Regulations because our personnel will be expected to use and disclose PHI in providing patient care or other related services for or on behalf of our clients.

6. **What requirements apply to Network Staffing Resources personnel under the Regulations?** All Network Staffing Resources personnel must review this "HIPAA Privacy Training Module" and sign and return the Certification Form to Network Staffing Resources no later than April 1, 2003 in order to be scheduled for any services after April 13, 2003. All Network Staffing Resources personnel will also be expected to participate in specific HIPAA training conducted by the particular health care client(s) for whom personnel are scheduled to provide services. Finally, all Network Staffing Resources personnel must remember that, at all times, they must:
- (i) Not use or disclose PHI, except as permitted by contract or required by law or regulation;
 - (ii) Maintain appropriate safeguards to prevent misuse and inappropriate disclosure of PHI; and
 - (iii) Report unauthorized uses or disclosures of PHI to the particular health care client and Network Staffing Resources staff.
7. **What types of civil and criminal penalties can be imposed for non-compliance?** Penalties for non-compliance resulting in misuse or wrongful disclosure of PHI are as follows:
- a. Civil money penalties of \$100 per incident, up to \$25,000 per person, per year, per standard; and
 - b. Federal criminal penalties of up to \$50,000 and one year in prison for improperly obtaining or disclosing PHI; up to \$100,000 and up to five years in prison for obtaining PHI under "false pretenses;" up to \$250,000 and up to 10 years in prison for obtaining or disclosing PHI with the intent to sell, transfer or use it for commercial advantage, personal gain or malicious harm.

**NETWORK STAFFING RESOURCES, INC.
HIPAA PRIVACY PERSONNEL CERTIFICATION**

I hereby acknowledge and agree that as a condition of my employment with Network Staffing Resources, Inc.,

1. I reviewed the HIPAA Training Module in full.
2. I agree to maintain the confidentiality of any and all protected health information ("PHI") of patients that I may access, use or disclose while providing services at one or more health care facilities as an employee of Network Staffing Resources, Inc., even after my employment relationship has terminated or otherwise expired.
3. I understand that if I fail to maintain the confidentiality of PHI of our patients:
 - a. I am at risk of disciplinary or other corrective action by Network Staffing Resources, Inc., up to and including termination of my employment.
 - b. I may be personally at risk of civil or criminal penalties on or after April 14, 2003 pursuant to applicable laws and regulations, including but not limited to the Health Information Portability and Accountability Act of 1996 ("HIPAA") and certain privacy and security regulations promulgated thereunder.

Signature

Printed Name

Date