

Neff Pharmacy Management, Inc HIPAA Privacy Statement and Confidentiality Agreement

Neff Pharmacy Management, Inc has the legal and/or ethical responsibility to safeguard the privacy of all Patients and Staff Members and to protect the confidentiality of their health information, personnel records, financial records, and all other confidential information.

In the course of your employment at Neff Pharmacy Management, Inc, you may come into possession of or have access to confidential information. This includes, but is not limited to, information that is in printed or written form, spoken verbally, in e-mail, on a computer screen, a computer disk, or on voice mail.

You understand that such information must be maintained in the strictest confidence. It is understood that, unless directed by management, you will not at any time during or after your assignment with Neff Pharmacy Management, Inc disclose any confidential information, or permit any person to examine or make copies of any confidential reports, or other documents prepared by you, coming into your possession, or under your control, unless that individual has a job-necessitated need to know or is otherwise authorized by law.

When confidential information must be discussed with other Staff Members in the course of your employment, you will use discretion to assure that such conversations cannot be overheard by others who do not have a job necessitated need to know.

CLASSIFICATION OF INFORMATION:

Patient Records: All medical, demographic and financial information related to customers in the Neff Pharmacy Management, Inc system is considered confidential and may not be discussed, disclosed or accessed unless such discussion, disclosure or access is to provide direct or indirect customer care activities and/or has been authorized by the customer, his/her legal representative or organizational protocols.

Personnel Records: All information related to personnel records of those employed or contracted through Neff Pharmacy Management, Inc is considered confidential and may not be discussed, disclosed or accessed unless such discussion, disclosure or access is authorized by the employee/contractee or organizational protocols.

Enterprise Wide Information: Defined by the administrative/management staff and includes information used in the strategic operation of the facility including but not limited to accounting records, vendor records, committee minutes, professional credentialing files, etc. It is the responsibility of the administrative and management staff to educate personnel as to what level of sensitivity or confidentiality specific types of information should be classified to and communicate it accordingly.

EXAMPLES OF VIOLATIONS

Include but are not limited to:

- Accessing information that is not within the scope of your responsibilities
- Disclosing your password or using another person's password
- Attempting to gain or gaining access to a secured application without proper authorization
- Unauthorized access, discussion, disclosure or altering of confidential customer/personnel information

Unauthorized collection, access, modification, or dissemination of information will constitute grounds for corrective action up to and including termination of employment or contractual relationship and/or pursuit of civil/criminal action or other legal remedy.

I have read this agreement and understand that violation of this agreement will result in disciplinary action up to and including termination.

Name *(please print)*

Date

Signature