

**INNER DOOR CENTER AND RECONNECT WITH FOOD
A DIVISION OF JUMP START CONSULTING, LLC
HIPAA POLICIES AND PROCEDURES**

Electronic transaction standards

It is our policy that exchange of information between Jump Start Consulting, LLC and a third party, in order to carry out financial or administrative activities related to healthcare, be HIPAA compliant.

At this time, Jump Start Consulting, LLC and respective divisions do not contract with any health plan and therefore do not bill insurance. However, once our contracts are in place, we will uphold to the following standards:

- 1. Submission of claims electronically to health insurance companies using transaction codes sets that include ICD-9 codes for all disease states treated by registered and licensed practitioners of Jump Start Consulting, LLC.**
- 2. CPT codes used are recognized by the American Medical Association.**

Procedures for electronic transactions, which also includes fax transmissions on behalf of the patient

1. Jump Start Consulting, LLC will be aware of its responsibility under HIPAA and stay current on all policy issues.
2. Jump Start Consulting, LLC will perform an operational assessment and identify any implementation issues and work plan for internal use and contracted vendor.
3. Jump Start Consulting, LLC will ensure that billing clearing house completes regular software upgrades, installation and testing.
4. Jump Start Consulting, LLC will adequately inform and train staff and vendors as to their responsibility under HIPAA.

Privacy Policies

It is our policy that Jump Start Consulting, LLC complies with HIPAA policy procedures when carrying out any activities related to treatment, payment and healthcare operations.

Procedures for carrying out privacy policies

1. Patients will be given an opportunity to review Jump Start Consulting, LLC's Notice of Privacy Procedures and independent practitioners' procedures.
2. A reasonable attempt will be made to obtain patient's written acknowledgement of receipt of Notice of Privacy Practices signed by the patient before delivering service, and if not, will document why this could not be obtained.
3. Notice of Privacy Practices will also be prominently posted on our website and made available electronically through our website. It will also be available for review in our patient office. Each independent practitioner will also have their own Notice of Privacy Practices available.
4. Inner Door's specific Privacy Policies Include:
 - a. Date of service can be cross-referenced in patient database accessed only by authorized administrative personnel.
 - b. Appointment screen and all conversations (phone or verbal) will be out of view and earshot, respectively of other patients currently in the office. Screensaver has password access.
 - c. Before confirming appointments, prior permission of patient will be obtained from respective patient. Messages will not be left on answering machine or with other family members without prior permission from the patient.
 - d. Passwords will be needed to access patient information via computer, which is stored in our administrative office away from our patient office.
 - e. Each individual therapist will keep their own patient records locked in their own patient files, while IOP files will be kept in a separate locked file cabinet so only treatment team members may access. These cabinets are in the administrative office.
 - f. Patients who wish to exit our back door will be allowed to do so if they do not wish to come in contact with other patients who may occupy our waiting room.
 - g. Patients will not be allowed in the back door, for security and privacy reasons, unless handicapped accessible entrance is needed or a large delivery is being made.
 - h. Patients are not allowed in the business office for any reason.
 - i. Soft notes developed for any patient will be shredded thoroughly and cross cut by individual therapists. All waste will be kept in separate opaque plastic receptacles, locked and disposed of regularly. Large volumes of soft notes will be taken to shred company.
 - j. All of our subcontractors and vendors will have HIPAA compliance measures in effect and will be asked to sign a business associate agreement in order to do business with us.

- k. Reports to physicians will be kept confidential by staff of Jump Start Consulting, LLC.

Security Policies

It is our policy that Jump Start Consulting, LLC complies with HIPAA security procedures when carrying out any activities related to Internet use, disaster recovery and employees who leave the system.

Procedures for carrying out security policies

1. Backup system will be done off-site with a HIPAA compliant company.
2. All HCFA Privacy protected information sent over the Internet will be accessed only by authorized parties.
3. All communication with patients, agreed to by the patient in advance, over the Internet will have adequate security controls.
4. All e-mail communications, to patient, from our office will contain the following disclaimer:

This message and accompanying documents are covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521, and contain information intended for the specified individual(s) only. This information is confidential. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, copying, or the taking of any action based on the contents of this information is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

5. Disposal of all computer media such as diskettes, tapes and hard drives will be done in a fashion which is in accordance with HIPAA regulations.
6. Jump Start Consulting, LLC will maintain state of the art wireless telephones as well as fax machines.
7. All independent practitioners, current employees, new hires and volunteers must sign a business associate agreement acknowledging that the employee or volunteer has read and understands our HIPAA policies/procedures and their responsibilities during their employment and upon termination.

8. Jump Start Consulting, LLC's designated "privacy official" will serve as a contact person to administer our privacy plan and will handle complaints or grievances.
9. Jump Start Consulting, LLC will maintain ongoing internal audit processes are important to see that all policies and procedures are intact.

