

# Great Rivers Behavioral Health Administrative Service Organization

Policy Title:	<b>Oversight of Protected Health Information</b>	Policy No. <b>5026.00</b>
Category:	Privacy & Security	Date Adopted: 1/10/2020 Date Revised: Date Reviewed:
Reference:	Washington Health Care Authority Contract with Great Rivers Behavioral Health Organization; 45 CFR 164.308; 164.310 and 164.312.	

## Policy:

- 1.1. Great Rivers Behavioral Health Administrative Services Organization (Great Rivers BH-ASO) maintains a framework to protect and secure an individual's right to Protected Health Information (PHI). Great Rivers shall maintain a structure that develops methods to prevent, detect, and resolve risks to PHI, individual rights, and confidentiality.
- 1.2. Great Rivers BH-ASO will create and regularly review administrative, physical, and technical safeguards implemented to secure Electronic Protected Health information (ePHI).
  - 1.2.1. Great Rivers BH-ASO will ensure the confidentiality, integrity, and availability of ePHI that Great Rivers BH-ASO or business associate creates, receives, maintains, or transmits.
  - 1.2.2. Great Rivers BH-ASO will strive to protect against anticipated threats or hazards to the security and integrity of ePHI.
  - 1.2.3. Great Rivers BH-ASO will take reasonable measures to anticipate uses or disclosures whether incidental, inadvertent, or intentional that are not permitted by the Health Insurance Portability and Accountability Act (HIPAA).
- 1.3. Great Rivers BH-ASO will complete a risk assessment that identifies changes at Great Rivers BH-ASO that may compromise the confidentiality, integrity, and availability of ePHI that Great Rivers or business associates create, receive, maintain, or transmit.

## Procedure:

### 2.1. Framework

- 2.1.1. The Privacy and Security Officers are responsible for carrying out the functions of implementing policies and procedures, monitoring and auditing, training, receiving reports on violations, investigating, and reporting to necessary authorities to ensure individual rights and confidentiality are maintained in accordance with federal and state regulations.
- 2.1.2. The Security Officer is responsible for the oversight of the safeguards and to work with Great Rivers BH-ASO's Privacy Officer to maintain confidentiality, integrity, and availability of ePHI at Great Rivers.
- 2.1.3. The Privacy and Security Officers will ensure Great Rivers BH-ASO meets the guidelines established by federal and state law related to confidentiality and security.
- 2.1.4. The Privacy and Security Officers will review the privacy and security policies on an annual basis.

### 2.2. Assessment of Safeguards.

- 2.2.1. An Assessment of Safeguards is to be completed for Great Rivers BH-ASO business functions that need to be further addressed on an annual basis or when major changes occur.
- 2.2.2. A plan will be created to address the areas as defined as not reasonably meeting the safeguard.
- 2.2.3. The assessment and plan will be brought to the management team for their understanding of current barriers and to support and advise future steps that will be happening at Great Rivers BH-ASO to meet the reasonable and appropriate standards.

2.3. **Risk Assessment**

- 2.3.1. The Risk Assessment and Management Plan will be completed annually or upon any major change. The Security Officer will be responsible for a risk assessment and management plan related to ePHI and the Privacy Officer will be responsible for a risk assessment and management plan related to PHI.
- 2.3.2. The Risk Assessment and Management Plan will be brought to the management team to evaluate and determine if the plan can be carried out with resources available.

2.4. **Monitor**

- 2.4.1. The Privacy Officer, or designee, will complete an annual internal review to identify potential deficiency and areas of improvement within Great Rivers BH-ASO.

2.5. **Documentation**

- 2.5.1. Information created for the oversight of federal and state guidelines related to protected health information will be maintained for ten (10) years.
- 2.5.2. Storage of documentation will be in accordance with established Great Rivers BH-ASO's document storage and record management procedures.

POLICY SIGNATURE

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Edna J. Fund, Chair  
Great Rivers BH-ASO Governing Board

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Date