



## PENINSULA RSN

### MANAGEMENT INFORMATION SERVICES POLICIES AND PROCEDURES

**Policy Name:** DATA TRANSFER TO THE DEPARTMENT      **Policy Number:** 4.02

**Reference:** DSHS Contract

**Effective Date:** 4/2004

**Revision Date(s):** 4/2006

**Approved by:** PRSN Executive Board

#### CROSS REFERENCES

- Policy: Corrective Action Plan

#### PURPOSE

To ensure that the Peninsula Regional Support Network (PRSN) maintains a primary and backup system for the transfer of electronic data to the Mental Health Division (MHD).

#### PROCEDURE

1. The Peninsula Regional Support Network contracts with Kitsap Mental Health Services (KMHS) to manage the Information Services (IS) system utilized by the PRSN.
2. KMHS, as contracted provider for PRSN Information Services, will use the SSH (Secure Shell) method of data encryption for all electronic data transfers to ensure confidentiality.
3. PRSN data is transferred (using the SSH software) to directories in the Mental Health Division (MHD) data system by connecting to the MHD Virtual Private Network (VPN) via an Internet connection.
  - All data is submitted in accordance with the current MHD Data Dictionary specifications.
  - Encounter data is submitted using HIPAA file formats.

4. In the event the MHD VPN connection is unavailable, data shall be submitted using a modem dial-in to the MHD data system.
  - This data connection will be tested for operation and viability at least once a year. The last certification of testing was accomplished February, 2006.
  - The modem dial-in connection is not secure, therefore once connectivity is established, the SSH software will be loaded to encrypt the data to be transmitted.
5. In the event neither connection is available, data will be sent to MHD using any other acceptable and agreed upon method
  - A writable CD or Flash Drive containing the data will be delivered directly to MHD.

## **MONITORING**

This policy is mandated by contract.

1. This policy will be monitored by the PRSN by the following means:
  - Kitsap Mental Health Services will report to the PRSN any loss of VPN services.
  - KMHS and the PRSN will debrief any loss of connection and resolve problems identified.
2. If a provider performs below expected standards during any of the reviews listed above a correction action will be required for PRSN approval. Reference PRSN Corrective Action Plan Policy.