



## PENINSULA RSN

### HIPAA AND MEDICAID COMPLIANCE POLICIES AND PROCEDURES

**Policy Name:** HIPAA MANAGEMENT INFORMATION AND CONFIDENTIALITY

**Policy Number:** 5.02

**Reference:** WAC 388-865-0275

**Effective Date:** 9/2005

**Revision Date(s):**

**Approved by:** PRSN Executive Board

#### CROSS REFERENCES

- Policy: Corrective Action Plans
- Policy: Data Transfer to the MHD
- Policy: Loading of MHD Enrollment Data
- Policy: IS Processing Procedures

#### PURPOSE

It is the policy of the Peninsula Regional Support Network (PRSN) to report required management information to the department and assure operation of a management information system; and ensure that provider information for persons receiving mental health services funded by public dollars is reported to the state mental health information system, according to departmental guidelines, and assuring that the consumer's right to confidentiality of information is upheld.

#### PROCEDURE

1. The PRSN, through its contract and Statement of Work with Kitsap Mental Health Services (KMHS), provides a management information system for providers; providers use the mental health information system as specified by sub-contract and statement of work for state-wide and/or PRSN management reports and for locating case managers.

2. The PRSN maintains and requires its providers and subcontractors to maintain confidentiality of information contained in the mental health information system in recognition of the consumer's right to confidentiality and according to WAC 388-865 and Chapters 70.02, 71.05 and 71.34 RCW.
  - a. The PRSN ensures all PRSN, county, provider or subcontractor staff having access to the mental health information systems are instructed in the confidentiality requirements through monitoring and review of providers.
  - b. The PRSN, county, provider or subcontractor maintains on file a statement signed by those staff with access to consumer identity or information which acknowledges understanding and agreement to abide by these requirements.
3. Contracted provider and subcontractors agencies will adhere to established PRSN data collection and reportage requirements (see MIS Data Collection and Reportage Policy).

## **MONITORING**

This policy is mandated by contract or statute.

1. This policy will be monitored through use of PRSN:
  - Annual PRSN Provider and Subcontractor Administrative Review
2. If a provider performs below expected standards during the review listed above, a Corrective Action will be required for PRSN approval. Reference PRSN Corrective Action Plan Policy.