

**Peninsula Regional Support Network (PRSN)
Maintenance Plan for HIPAA Policies**

Task	Staff Responsible	Comments	Frequency /Due Date	Comments
Through the Administrative Review process ensure continuous monitoring of compliance with PRSN HIPAA policies throughout network.	Stacey Smith	This is on the annual Administrative Review Tool	On-going, annual reviews	
Through the Administrative Review process ensure continuous monitoring of the provider staff are instructed in the confidentiality requirements.	Stacey Smith	This is on the annual Administrative Review Tool	On-going, annual reviews	
Through the Administrative Review process ensure continuous monitoring of the provider staff signed statement that acknowledges understanding of requirements in personnel records.	Stacey Smith	This is on the annual Administrative Review Tool	On-going, annual reviews	
Assure all PRSN staff have on file a signed statement that acknowledges understanding of requirements.	Linda Ward	Signed statements for each PRSN staff person will be kept on file by the Administrative Assistant.	Annually	
Designation of HIPAA Contact Person	Linda Ward	The role of the HIPAA Contact person is the responsibility of the Administrative Assistant. This position is responsible for receiving complaints and retaining original copies of complaints.	As needed	

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Provision of Training requirements	Tina Mitchell	PRSN staff are trained on the HIPAA privacy regulations.	Every Three years, and when there are new staff	
Assure all staff who have received HIPAA training have signed a statement acknowledging the training.	Tina Mitchell	To be completed at the time of training and kept on file with signed statements that acknowledge understanding of requirements.	Every three years and when there are new staff	
Creation and distribution of a privacy and/or security reminder newsletter/flyer.	Tina Mitchell and Linda Ward	To be distributed via e-mail and in routine meetings.	Every three months	
Continuous practice of physical safeguards.	All PRSN Staff	Any documentation containing PHI is maintained in a locked file cabinet with keys hidden.	Ongoing	
Posting of Privacy Notice	Tina Mitchell	The PRSN Privacy Notice is posted in a visible area.	Ongoing	
Accounting of Disclosures	Linda Ward	A file containing a log to document disclosures is maintained by the Administrative Assistant.	Ongoing	

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Continuous practice of password protection	Kitsap County Information Services Department	All PRSN staff have a unique and confidential password to access the PRSN computer systems and e-mail. Passwords are regularly changed (every 60 days) maintain security of the system.	Ongoing.	
Observation of E-mail confidentiality policies	All Staff	It is the policy and practice of the PRSN that no e-mail message shall contain PHI. If at any time either a PRSN employee or contactor transmit PHI as part of an e-mail message, the PRSN employee shall immediately notify the sending party and the Privacy Officer.	Ongoing	
Observation of Fax confidentiality policies	All Staff	A HIPAA confidentiality statement is on the PRSN fax cover sheet. Faxes should only be sent with the PRSN fax cover sheet.	Ongoing	

Task	Staff Responsible	Comments	Frequency /Due Date	Comments
Use of other Electronic Communication	All Staff	Electronic communications containing PHI may be accomplished using the shared network drive that will be accessible to PRSN staff and provider agencies through the system "Virtual Private Network/Secure Socket Layer system".	Ongoing	
Ensure signed Business Associate Addendum are in place	Anders Edgerton	Each contract provider must have signed the Business Associate Addendum. The addendums are kept on file at the PRSN office.	Completed	
Website	Anders Edgerton	A HIPAA statement is added to the PRSN Mental Health webpage within the Kitsap County website.		