

**PRSN Subcontractor Delegation & Assessment Tool- Regional IS**

The Peninsula Regional Support Network (PRSN) is accountable for any functions and responsibilities that it delegates through a subcontract. The PRSN conducts a subcontractor delegation review of current subcontractors to assess satisfactorily performance of contracted PRSN/PIHP functions. This tool will be used in conjunction with the External Quality Review Organizations (EQRO) annual findings, as they relate to the contracted regional IS functions.

Delegated Contractor: Kitsap Mental Health Services Date: \_\_\_\_\_

Delegated PIHP functions: Information Services

**Audit Instructions**

Please reference agency documentation for each item to review via desk audit. The Agency Comments column is optional. It is provided to allow additional comments/ explanations.

#	ITEM	PRSN SCORE	Agency Documentation	Agency Comments
<b>1. Organizational capacity to perform subdelegated functions</b>				
a	Maintain compliance with regional IS policies and procedures covering the adherence to contract and relevant regulations Examples of evidence - Review of P&P for contract/ regulation requirements for completeness and how they are internally monitored (including data security and disaster recovery requirements).			
Manage all aspects of the PRSN IS system to report and ensure:				
b	Report and ensure recording of data on service authorizations (outpatient, inpatient, residential, Provider 1 PA technical assistance) Examples of evidence – Review of data reports			
c	Report and ensure provision of data for PRSN quality management needs Examples of evidence – Review of data reports and requests for QA reports			
d	Ensure daily back-up and tape storage for all sites Examples of evidence - Review of back-up storage process			
e	Manage and ensure control system security set-up for each provider Examples of evidence – Review of the security and system disaster recovery process			

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f	Set up and maintain the necessary items to allow the state core data to be entered into system Examples of evidence - Review encounter data and data error reports			
g	Ensure Management and submission compliance as stated in the contract between the PRSN/ KC and the DBHR Examples of evidence - Verify process, including data certification process			
h	Install and apply appropriate system software and operating system upgrades Examples of evidence - Review dates of system upgrades and installations			
i	Maintaining an internal quality management/quality improvement process Examples of evidence - Review of applicable documentation, such as meeting minutes, training venues, network satisfaction surveys, etc.			
j	Provide timely contract specific activities and reports of acceptable quality Examples of evidence - Review reports or sample reports of prospective subcontractors			
k	Adequate training is provided/ available to the region Examples of evidence - Training logs			
l	KMHS IT communicate system improvement strategies to the PRSN, make recommendations for system changes/ improvement Examples of evidence - Feedback provided to the PRSN			
m	KMHS IT is responsive to identified problems and has established effective communication with each providers' "system manager" Examples of evidence - Internal QA/ QI projects, informal & formal feedback, etc			
<b>2. Staffing Capacity</b>				
a	The availability of qualified staff to perform delegated functions and sufficient staff to maintain regional IS CMHC system. Examples of evidence - Analyze contractor ability to analyze staffing sufficiency, request annually updated staffing directory, and require PRSN notification with significant reduction/ changes to staffing patterns.			
b	Hiring for IS staff includes background checks, federal exclusions and reference checks. Examples of evidence - Review personnel files for noted documents.			
c	Provides adequate and appropriate training and supervision to KMHS IT staff. Examples of evidence - Review organizational chart and personnel/ training files			



#	ITEM	PRSN SCORE	Agency Documentation	Agency Comments
b	<p>Storage of data on portable media or devices is given special protection, if being transported outside of an secure area, by: (which of the following)</p> <ul style="list-style-type: none"> <li>___ Encrypting the data and devices</li> <li>___ Controlling access to devices with a password or stronger authentication methods</li> <li>___ Manually locking devices whenever they are left unattended and setting devices to lock automatically after a period of inactivity (maximum period is 20 minutes)</li> <li>___ Physically protect portable devices an media by: keeping them locked storage when not in use, using check-in procedures, and frequent inventories</li> </ul>			
c	<p>Data segregation.                      DSHS data is segregated or otherwise distinguishable from non-DSHS data. This includes procedures for storage of data on media, in a logical container, within a shared database, and paper documents.                      Examples of evidence – Review of the segregated data system</p>			
d	<p>Data disposition.                      Data is destroyed in accordance with the DSHS IT Security Policy.                      Examples of evidence – Review of the process</p>			
e	<p>Notification of Compromised or Potential Compromise.                      Process to notify DSHS and the PRSN within one business day if the data is compromised or potentially compromised.                      Examples of evidence – Review of the notification process</p>			
f	<p>Data shared with sub-contractors.                      Data security provisions, for data shared with subcontractors, are included in the contract and accompanying documents.                      Examples of evidence – Review of applicable subcontracts</p>			