



SALISH BH-ASO POLICIES AND PROCEDURES

Policy Name: PRIVACY AND SECURITY POLICIES MAINTENANCE PLAN **Policy Number:** PS903a

Effective Date: 1/1/2020

Revision Dates:

Reviewed Date:

Executive Board Approval Dates: 5/22/2020

Task	Staff Responsible	Comments	Frequency/ Due Date	Comments
Designation of Privacy Officer	Administrator	The role of the Privacy person is to be a point of contact for all HIPAA, HITECH, and 42 CFR Part 2 concerns, investigate and report violations, as needed, and maintain up to date trainings and activities.	As needed	
Ensure continuous compliance with SBH-ASO Privacy policies throughout network	Privacy Officer	SBH-ASO subcontractors are required by contract to adhere to SBH-ASO policies and procedures.	As needed	
Assure all SBH-ASO staff have on file a signed statement that acknowledges understanding of requirements	Privacy Officer	Signed statements for each SBH-ASO staff person will be kept on file by the Privacy Officer.	Annually	

Task	Staff Responsible	Comments	Frequency/ Due Date	Comments
Provision of Training requirements	Privacy Officer	SBH-ASO staff is trained on the HIPAA privacy regulations.	Upon hire (w/in 90 days) and every year after	
Assure all staff who have received HIPAA training have signed a statement acknowledging the training	Privacy Officer	To be completed at the time of training and kept on file with signed statements that acknowledge understanding of requirements	Upon hire (w/in 90 days) and every year after	
Maintain Breach Log and submit to HHS secretary as required	Privacy Officer	Maintain a Breach Log of any violation of SBH-ASO Privacy Policy and/or any HIPAA/HITECH/42 CFR Part 2 breaches. Includes risk analysis for any identified breach and notification of the Secretary of HHS as required.	Ongoing maintenance. Annual reporting, or as required.	
Maintain a risk assessment that is updated regularly and as needed	Privacy Officer /Compliance Officer	Maintain a current risk assessment report to mitigate privacy, security and compliance issues. This report is reviewed regularly for changes to the process and updated as needed.	Annually and/or as needed.	
Creation and distribution of a privacy and/or security reminder newsletter/flyer	Privacy Officer	To be distributed via email and in routine meetings	Semiannually	
Continuous practice of physical safeguards.	All SBH-ASO Staff	Any documentation containing PHI is maintained in a locked file cabinet with keys hidden.	Ongoing	
Posting of Privacy Notice	Privacy Officer	The SBH-ASO Privacy Notice is posted in a visible area.	Ongoing	
Accounting of Disclosures	Privacy Officer	A file containing a log to document disclosures is maintained by the Privacy Officer.	Ongoing	

Task	Staff Responsible	Comments	Frequency/ Due Date	Comments
Continuous practice of password protection.	Kitsap County Information Services Department, All SBH-ASO Staff	All SBH-ASO staff have a unique and confidential password to access the SBH-ASO 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 SBH-ASO Staff	It is the policy and practice of the SBH-ASO that no e-mail message shall be sent containing PHI unless it is sent with electronic encryption that meets National Institute of Standards and Technology to verify email address. If at any time either an SBH-ASO employee or contactor transmits unencrypted PHI as part of an e-mail message, the SBH-ASO employee shall immediately notify the sending party and the Privacy Officer.	Ongoing	
Observation of Fax confidentiality policies.	All SBH-ASO Staff	A HIPAA confidentiality statement is on the SBH-ASO fax cover sheet. Faxes should only be sent with the SBH-ASO fax cover sheet.	Ongoing	

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