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Document Scope: (applies to Policy & Procedure only)

- The requirements herein apply only to the GCBH Central Office and its functions.
 - X - The requirements herein apply, verbatim, to GCBH and its network providers².
 - The requirements herein apply both to GCBH and its network providers². Additionally, network providers must have internal documents outlining their processes for implementing the requirements, insofar as they relate to actions for which network providers are responsible.
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PURPOSE: To clarify responsibility for Information Systems (IS) within Greater Columbia Behavioral Health (GCBH).

DEFINITIONS

I. None

POLICY

- A. Providers, Member Governments, and the GCBH Regional Office are each responsible for the functionality of the information system at their location. This includes hardware and software support, maintenance, network security, and replacement. This policy addresses:
- Data to be reported.
 - Efforts to ensure the confidentiality of all sensitive and protected information.
 - Support for efficiency of IS purchases and sharing of technical expertise.
 - Flexibility to meet various needs.
 - Identification and/or clarification of areas of IS responsibility.

PROCEDURE

1. GCBH Regional Office:
 - 1.1. Ensures timely submission of required data to the Washington State Department of Social and Health Services (DSHS)/Mental Health Division (MHD), Member Governments, and/or Providers as appropriate.
 - 1.2. Provides consultation and recommendations regarding required GCBH and MHD Data Dictionary elements, contractual and legal requirements.
 - 1.3. Develops mechanisms and procedures to improve the consistency, accuracy, and timeliness of data collected by GCBH.
 - 1.4. Develops and monitors QA/QI standards (i.e., software, security, etc.) for GCBH Information Systems.
 - 1.5. Is the central repository for GCBH data.
 - 1.6. Develops new systems that take advantage of technology to enhance the administrative functions of the GCBH Regional Office.

¹See definitions of document types in AD100, "Development, Approval & Review of Formal RSN Documents"²"Network Provider" – An organization with which GCBH is contracted for the provision of direct services.

- 1.7. Responds to ad hoc requests for information from the MHD.
 - 1.8. Provides GCBH Regional Office staff with flexible reporting tools, both ad hoc and pre-designed.
 - 1.9. Provides Member Governments with the ability to retrieve reports from the central repository regarding their provider's data.
 - 1.10. Provides Provider management and their MIS staff with the ability to retrieve reports from the central repository on their own data for reconciliation or other purposes.
 - 1.11. Ensures the confidentiality of all information in the central repository in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA).
 - 1.12. Integrates inpatient and outpatient information streams.
 - 1.13. Maintains the integrity of all data files by ensuring that data meets validation criteria as well as relational integrity criteria.
 - 1.14. Explores how to most efficiently transmit data and reports over this wide geographic area for both the short and long term.
 - 1.15. Develops and maintains the GCBH Internet Web Site.
 - 1.16. Collects GCBH data and assures that records are unduplicated across all provider data streams.
 - 1.17. Provides a means for authorized provider staff to verify and determine Medicaid eligibility for services to be quickly and accurately determined.
 - 1.18. Integrates financial, service, demographic, and other data for analysis.
 - 1.19. Prepares GCBH to meet anticipated future data needs in the future.
 - 1.20. Conducts or arranges bi-annual security review of the information systems within GCBH.
 - 1.21. Develops management reports to be utilized by:
 - 1.21.1. GCBH Utilization Management Services (for tracking and monitoring of crises).
 - 1.21.2. GCBH Quality Management Oversight Committee (QMOC) in the synthesis and analysis of trends.
 - 1.21.3. GCBH Regional Office staff, Member Governments, and Providers in capacity management.
 - 1.22. GCBH Regional Office IS staff assists in planning and conducting of Provider Contract review.
 - 1.23. Conducts other IS duties as defined by the GCBH Board of Directors
2. Member Governments/Providers:
 - 2.1. Provide technical training to provider staff regarding IS and required GCBH and MHD Data Dictionary elements.
 - 2.2. Provide technical training for "standard" software.
 - 2.3. Maintain awareness of GCBH MIS Committee activities.

- 2.4. Conduct local problem resolution.
 - 2.5. Implement GCBH standards.
 - 2.6. Provide local infrastructure enhancement.
 - 2.7. Provide local system maintenance, support, and replacement including maintaining network security standards.
 - 2.8. Maintain functionality of the information system at their location.
 - 2.9. Ensure timely submission of required data to the GCBH Regional Office.
 - 2.10. Develop new systems that apply technology to reduce costs, enhance the delivery of services, and integrate GCBH-wide information standards.
 - 2.11. Operate information systems that gather and report data.
 - 2.12. Maintain up-to-date demographic information, including but not limited to address and telephone number to ensure compliance with MHD survey requests.
 - 2.13. Maintain data banks on all clients served (active and inactive).
3. MIS Committee:
 - 3.1. Recommends refinement of IS standards.
 - 3.2. Pursues efficiency of purchase and shared expertise.
 - 3.3. Monitors IS quality assurance and quality improvement implementation.
 - 3.4. Conducts other duties as assigned by the GCBH Board of Directors.

Current Minimum Technical Standards

4. Data Interchange Standard:
 - 4.1. Provider software is capable of extracting all required information as described in the GCBH Data Dictionary and Trading Partner Agreement and MHD/CIS Service Encounter Reporting Instructions.
 - 4.2. Provider software is able to format extracted information as described in the GCBH Data Dictionary and Trading Partner Agreement and MHD/CIS Service Encounter Reporting Instructions.
 - 4.3. Provider is able to encrypt and transmit data for processing by GCBH in formats as supported by GCBH.
 - 4.4. When purchasing new hardware/software, the entity is encouraged to purchase products that meet current industry standards and are compatible with products utilized within GCBH.
5. Security:

5.1. The GCBH Network and HIPAA Security Policies/Procedures contain the minimum requirements necessary for protecting the integrity and confidentiality of GCBH data and for protecting information technology resources.

6. Data Requirements:

6.1. GCBH Data Dictionary contains the core data elements required by GCBH. This includes data elements from the MHD Data Dictionary, as well as those additional elements approved by the GCBH Board of Directors. This document is modified in order to accommodate updates and revisions as approved by the GCBH Board of Directors or as mandated by changes in the MHD data requirements (please see GCBH Policy 703 Establishing or Removing GCBH Data Dictionary Elements).

7. Quality Assurance:

7.1. GCBH IS data integrity process identifies potential sources of error which provides for timely correction.

8. Integration with GCBH QM Program: The GCBH Information System is a key component of the GCBH Quality Management infrastructure. IS data within data management reports, QRT reports, Ombuds reports, QMOC review and analysis, clinical review, and contract audits provides valuable information necessary for tracking of performance measures and making informed management decisions. Feedback is provided to management, QMOC, MIS Committee, Member Governments, Providers, and funding sources.

9. Community Integration/Cross System Relationships: Maintaining a minimum regional standard for IS functionality enables GCBH to share data electronically, where appropriate, in order to more effectively and efficiently serve GCBH consumers and to communicate efficiently with allied systems of care. Where possible and appropriate, there is coordination of service provision to reduce duplication of effort and facilitate the appropriate utilization of system-wide services.

10. Cost Analysis: Member Governments and Providers are fiscally responsible for maintaining their own information systems, and funding is made available for this purpose. Regional Office roles and responsibilities are anticipated to be covered by the Regional Office budget, and at a minimum, this review will address the following questions:

10.1. Were expected outcomes achieved?

10.2. What was and/or is the level of integration and cross-system activity?

10.3. What are the QMOC recommendations related to this review?

APPROVAL

William Wilson, DrPH
Director

03/13/08