

GREATER COLUMBIA BEHAVIORAL HEALTH Policies and Procedures

Category: Privacy and Security
Approved On: 03/27/2003
Approved By: The Board of Directors
Revised: 00/00/00
Effective Date: 15 days from approval/ the last revision

No: PS617.00

Title: Sources of PHI: Inventory and Location

I. Policy:

GCBH creates, receives, and maintains protected health information in the course of conducting its business. Reasonable efforts will be employed to safeguard the confidentiality of this information. The following list describes the type and location of PHI within the Region Office:

<u>Type</u>	<u>Created</u>	<u>Received</u>	<u>Location</u>
Case / Progress Notes	Ombuds	Ombuds	Locked Files – Ombuds Office Locked Storage – GCBH Region Office (Old records)
Children’s Long-Term Inpatient Program (CLIP) Client Information		Front Office	Consumer name, DOB, type of records and destination recorded in CLIP Log. All records forwarded to GCBH Resource Manager or Provider
Claim Remittances/EOB			
CLIP Monthly Report		Contracts Coordinator	Locked Files
Consultant Reports (i.e., Dr. Lippman)		UM Staff Contracts Coordinator Coordinator	Locked Files in respective staff offices.
Consumer Demographic and Encounter Information (as required in GCBH Data Dictionary)		IS Manager	Network Server
Consumer Demographics (Complaints and Grievances – Ombuds)	Ombuds		Network Server - Ombuds
Data Resolution Reports	IS Manager	IS Manager	Locked Files
Department of Corrections Client Information		UM	Name and client identification number recorded in DOC Log. All records forwarded to GCBH designee.
Enrollment/Eligibility Data		IS Manager Finance Mgr, UM, Contracts Coordinator	Network Server, Personal Workstations, Website (private side)
Health Care Insurance Claims		Contracts Coordinator	Locked Files
Other Collected Health Information:		UM Contracts Coordinator	Locked Files
o Specialized Services/ Programs Client Information (i.e., ECS, DDD – MARR Clients, DDD Enhanced Services)			
o Inpatient Reports		IS Manager	Locked Files
Referral/Authorization Forms		UM Contracts Coordinator	Locked Files in respective staff offices
Requests for Records	Ombuds	Ombuds	Locked Files – Ombuds Office Locked Storage – GCBH Region Office (Old information)
Service related invoices (residential, personal care)		Accountant	Locked Files
Staff/Client Correspondence	UM Staff Ombuds	UM Staff Ombuds Coordinator	Locked Files in respective staff offices.
Treatment plans		Ombuds	Locked Files – Ombuds Office
Utilization/Quality Data	UM	UM	Locked Files

II. Scheduled Review of this Policy:

The review of the GCBH policies and procedures manual is on a two year cycle. The GCBH policy review and revision approval process is a three month process. This policy is scheduled to be reviewed every second year:

- A. by GCBH staff by April of odd years,
- B. by the Regional Advisory Board (RAB) by May of odd years,
- C. by the GCBH Board of Directors by June of odd years, and
- D. outside of the schedule if required.