

GREATER COLUMBIA BEHAVIORAL HEALTH Policies and Procedures

Category: Privacy and Security
Approved On: 08/2004
Approved By: The Board of Directors
Revised: 00/00/00
Effective Date: 15 days from approval/ the last revision

No: PS620.00

Title: HIPAA Training

- I. The Health Insurance Portability and Accountability Act (HIPAA) was passed in 1996 as part of Congressional Response to the breach of confidentiality of consumer's protected health information. Health is a broadly defined term in HIPAA to include all medical, psychological, therapeutic and social services provided to a consumer where the information is either stored electronically or the fee for the services is billed electronically. GCBH both stores protected health information electronically and bills for services electronically so we are what is called a "covered entity" under HIPAA.
- II. One of HIPAA's requirements is that agency staff are trained every three years on the requirements of the Privacy and Security Regulations of the law.

THE TRAINING OUTLINE INCLUDES THE FOLLOWING:

A. An Overview of the Law:

1. Technology
2. Policy
3. Practice

B. Purpose of the Privacy Regulations

C. Purpose of the Security Regulations

D. Purpose of the Standardization of the Transaction and Code Sets

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E. Privacy Regulations:

1. Definition of Protected Health Information
2. Individual Rights to Notice, Access, Accounting and Modification.
3. Business Relationships
4. Policies and Procedures of the Agency
5. Need to Know “Minimal Necessary Disclosure”

F. Security Regulations:

1. Administrative Safeguards:
 - a. Contingency Plan
 - b. Chain of Trust Agreements
 - c. Access procedures
 - d. Incident Response Procedures
 - e. Virus Protection and Backup requirements
 - f. Media Controls (use and storage of disks).

2. Technological:
 - a. Authorization Controls
 - b. Data Authentication
 - c. Unique User ID
 - d. Passwords/PIN/Tokens (Password Management)
 - e. Automatic Log off

3. Physical Safeguards:
 - a. Assigned Security Responsibility

- b. Physical Access Control
- c. Controls over physical media
- d. Secure Workstation Location
- e. Policy over Workstation Use
- f. Security Awareness Training
- g. Work Station Use

The Training Curriculum is reviewed and modified as required annually through the efforts of the Privacy Officer and the Security Officer of the agency.

III. 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 particular policy is scheduled to be reviewed every 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.