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<b>Document Type:</b> <sup>1</sup>	<input checked="" type="checkbox"/> Policy & Procedure	<input type="checkbox"/> Process Guideline	Adopted: 07/02/09
	<input type="checkbox"/> Plan	<input type="checkbox"/> System Description	Last Reviewed: 00/00/00
			Retired: _____

Revisions: Combines PS613 &amp; PS614

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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 providers<sup>2</sup>.
  - The requirements herein apply both to GCBH and its network providers<sup>2</sup>. 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 address requirements given in 45 CFR § 164.306 for securing protected health information during electronic transmission.

**DEFINITIONS**

- I. Protected Health Information (PHI): Any identifying information that could indicate or suggest a person's health care status, health care payments, or provision of care.
- II. Health Insurance Portability and Accountability Act of 1996 (HIPAA): Federal law with guidelines regarding data access, security, etc. Information regarding this act can be found at <http://www.hhs.gov/ocr/hipaa/>.

**POLICY**

- A. Greater Columbia Behavioral Health (GCBH) and its network providers maintain technical security measures to guard against unauthorized access to electronic protected health information that is being transmitted over an electronic communications network.
- B. GCBH and its network providers maintain current documentation outlining the specific procedures associated with assuring secure data transmission and assure that staff engaged in data transmission understand and adhere to these procedures. At a minimum, these procedures address practices to ensure email, Internet, and fax security.
- C. The minimum allowable encryption level for PHI is Triple DES, AES-128, or a stronger alternative.
- D. GCBH Central Office Staff conduct onsite reviews of provider agencies biennially to verify compliance with this policy.

**APPROVAL**/s/ Julie LaPierre

Interim Director

07/02/09

PS627 replaces PS613-Email and Internet Security and PS614-Fax