

SOUTHERN HIGHLANDS COMMUNITY MENTAL HEALTH CENTER

POLICY AND PROCEDURE MANUAL

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Policy 182– Computerized Clinical Information

I. POLICY

It is the policy of Southern Highlands Community Mental Health Center that all computer processed or microfilm consumer information is protected with the same diligence as the original consumer record.

II. DISCUSSION

The policies of the Center are intended to ensure that every consumer's right to privacy is protected. The procedure listed below details the security of disks, tapes, and microfilm records of consumers. Please refer to HIPAA Policy 507 – Designated Record Set for additional information. Please refer to HIPAA Policy 537 – Workforce-related Security Measures for additional information. Please refer to HIPAA Policy 538 – Access Control for additional information. Please refer to HIPAA Policy 523 – Right to Restrict Uses and Disclosures of PHI for additional information.

III. PROCEDURE

- A. The System Manager will assign each data entry operator a specific code to be used as access to the computer system. This code will limit access to the files that pertain to the specific operator. The codes will be changed every six (6) months or as necessary.
- B. Computer terminals will be secured when the Center is closed as follows.
 - 1. Fee Clerk Office – The office will be locked after business hours.
 - 2. Central Appointment Clerk – The office will be locked after business hours.
 - 3. Accounting – The office will be locked after business hours.
 - 4. Business Office – Individual offices will be locked after business hours.
 - 5. Computer Room – The computer room will be locked after business hours.

- C. Back-up files are maintained for all current information system data as follows.
1. A daily back-up is completed on all data files. A different set of tapes labeled Monday thru Thursday will be used each day. These tapes are reused each week.
 2. A weekly back-up is completed on Friday on the full system. A different set of tapes will be used each Friday of the month until the monthly back-up is completed.
 3. A monthly back-up is completed on the full system after accounts receivable and the general ledger has been closed. These tapes will be labeled Month 1 thru Month 3 and will be reused each quarter. A duplicate back-up is completed at the time of the monthly closing and is kept off site at the Substance Abuse unit location. This back-up will be locked in medical records.
 4. A quarterly back-up is completed on the full system at the close of accounts receivable and the general ledger each quarter. The quarterly back-up tapes will be reused after the year-end back-up is completed.
 5. A year-end back-up is completed on full system and is stored indefinitely.
 6. When the last payroll of December is completed, two back-ups of the payroll file will be completed. These tapes are kept indefinitely.

All back-up tapes are kept in the fire proof safe in the computer room and are only accessed by the System Manager or designated staff (designated by the System Manger).

- D. All computer generated consumer specific data which is distributed to staff in all locations will be shredded after the data has been reviewed. Until the reports are destroyed, they will be locked in the individual staff's office. The original copies of consumer reports are stored in the business office for one year. At the end of the fiscal year, reports are stored in the locked storage building or in the medical records room. Some reports may be destroyed at the end of the year (see policy regarding record retention).
- E. All consumer specific computer input forms (referrals, face sheet, etc.) entering the data entry process will be destroyed after they have been input into the system. (This does not include Service Activity Logs.) The forms will be stored in the business office until they can be destroyed. All Service Activity

Logs are stored after input into the computer system in the computer room for three months. At the end of the third month, the logs are stored in the medical records room for one year. After the logs are stored for one year, they can be destroyed.

- F. Southern Highlands CMHC will have a written Business Associate Agreement with each vendor who has access to computerized or microfilm data (see attached agreement) to maintain confidentiality of all consumer data.
- G. Closed charts are microfilmed to reduce the need for storage of the original chart. To ensure the microfilmed charts are returned on the proper consumers, the following procedure is followed.
 - 1. Records selected for microfilming are recorded in order they are microfilmed in a notebook.
 - 2. The index card from the closed card file is pulled and attached to the record to be microfilmed.
 - 3. Make corrections to the index card if necessary (i.e., address, telephone, case manager, etc.).
 - 4. Assemble the closed material in the following order: 1) Termination; 2) Face Sheets; 3) Continuing Treatment; 4) Social History; 5) Treatment Plan; 6) Program Notes; 7) Psychiatric; 8) Psychological; 9) Financial; 10) Legal; 11) Other Treatment; 12) Correspondence. Each admission is assembled separately, current admission first, etc.
 - 5. Each time information is microfilmed on a consumer, a brief description of the information being microfilmed, microfilm roll number, and index number are typed on the consumer's index card.
 - 6. When a roll of film is completed and ready to be mailed, the return address and microfilm roll number are attached to film inside the mailing container.
 - 7. When process film has returned, the film is read by using the reader/printer. The odometer indicates the index number to be placed on the consumer's index card.
 - 8. After the microfilm has been processed and the index number and microfilm roll number has been typed on the index card, the card is filed in the closed cases file.

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Vendor Agreement

It is the policy of the West Virginia Department of Health and Human Resources to have the agencies providing behavioral health services to have a written agreement with all computer and microfilm vendors to ensure confidentiality on all consumer data. See HIPAA Policy 502 – Uses and Disclosures for Treatment, Payment and Health Care Operations.

The undersigned agree not to divulge any consumer information without the consumer’s written consent.

Signature

Vendor