

SOUTHERN HIGHLANDS COMMUNITY MENTAL HEALTH CENTER
POLICY AND PROCEDURE MANUAL

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Section Number 500

Policy 500 – HIPAA Policies and Procedures

I. PURPOSE

To issue instructions to employees regarding SHCMHC’s obligations relating to the implementation of the Health Insurance Portability and Accountability Act (HIPAA), HITECH, Omnibus and 42-CFR Part 2.

II. DEFINITIONS

Protected Health Information (PHI) – Individually identifiable information relating to past, present or future physical or mental health or condition of an individual, provision of health care to an individual, or the past, present or future payment for health care provided to an individual.

Workforce – Employees, volunteers, trainees, and other persons whose conduct, in the performance of work for SHCMHC, is under the direct control of SHCMHC, whether or not they are paid by SHCMHC.

III. GUIDELINES

1. SHCMHC will design and implement policies and procedures to assure appropriate safeguarding of PHI in its operations to be followed by each office, program or site, and all workforce members.
2. All employees will be directed to follow all applicable policies and procedures found in the HIPAA Policies and Procedures Manual maintained on SHCMHC Intranet site for all staff to review. If staff do not have access to the Intranet, they will request assistance from their supervisor or another member of Management.
3. SHCMHC will change its policies and procedures as necessary and appropriate to conform to changes in law or regulation.
4. SHCMHC may also make changes to policies and procedures at other times as long as the policies and procedures are still in compliance with applicable law. Where necessary, SHCMHC will make correlative changes to its Privacy Notice. We will not implement a change in policy or procedure prior to the effective date of the revised Privacy Notice.

5. SHCMHC will maintain the required policies and procedures, and all communications, actions, activities or designations as are required to be documented by HIPAA regulations, for a period of six (6) years from the later of the date of creation or the last effective date or such longer period that may be required under state or other federal law.