



Policy and Procedure

Section: Information Technology
Subject: HIPAA Privacy & Security Standards
Policy Number: IT- 001
Effective Date: November 1, 2011
Revision Date: NA
Review Date: NA

Policy: Concordia strives to protect the confidentiality, integrity, and availability of electronic protected health information (ePHI) by taking reasonable and appropriate steps to address the requirements of the Health Insurance Portability and Accountability Act (HIPAA) Security Regulations. These policies guide Concordia's efforts to comply with the requirements of the Security Regulations. Concordia intends these policies and specifications to augment and reinforce the HIPAA Privacy policies and procedures of Concordia and its covered components. Concordia shall construct reasonable and appropriate administrative, physical and technical safeguards that ensure integrity, availability and confidentiality of any and all ePHI it collects, maintains, uses or transmits. A Privacy/Security Officer will be designated who will have the responsibility of enforcing HIPAA regulations for Concordia.

Purpose: To outline the general requirements of the Health Insurance Portability and Accountability Act (HIPAA), specifically the Privacy Rule and Security Rule to ensure that Concordia Behavioral Health develops, adopts and implements adequate policies, procedures and processes to meet these national standards for the management of protected health information (PHI) and electronic protected health information (ePHI).

Procedure: *Security Standards/Rule*

1. To construct adequate safeguards Concordia will: a) assess potential risks and vulnerabilities to ePHI that it maintains or transmits; b) develop, implement and maintain appropriate security measures given those anticipated risks; c) document those measures and keep them current; and d) ensure compliance by officers and employees through a training program.

Privacy Standards/Rule

1. Concordia's privacy protections will be extended to every member whose information is collected, used or disclosed.
2. A Notice of Privacy Practices will be developed and disseminated to members that in general terms describe how Concordia will protect health information and will specify the member's rights to control information associated with their health care and decisions, including extra protections extended to psychotherapy notes.
3. Concordia will implement and enforce the "minimum necessary standard" within its workforce, meaning that for those dealing with PHI and ePHI the collection, use and



disclosure should be no greater than necessary to complete a work-related task. Policies & procedures will include sanctions for employees that violate them including termination for serious or repeated violations.

4. Concordia shall include privacy requirements in its contracts with business associates and appropriate forms will be executed.
5. Education about HIPAA Privacy rules and Concordia's privacy practices will be develop in a manner appropriate to employee's job responsibilities.

**HIPAA
Regulatory
Information:**

CATEGORY: Policies and Procedures and Documentation Requirements

TYPE: Standard

HIPAA HEADING: Policies and procedures

REFERENCE: 45 CFR 164.316(a)

SECURITY REGULATION STANDARDS LANGUAGE: "Implement reasonable and appropriate policies and procedures to comply with the standards, implementation specifications, or other requirements of this subpart taking into account those factors specified in § 164.306(b)(2)(i),(ii),(iii), and (iv)[Security Standards: Flexibility of Approach].This standard is not to be construed to permit or excuse an action that violates any other standard, implementation specification, or other requirements of this subpart. A covered entity may change its policies and procedures at any time, provided that the changes are documented and are implemented in accordance with this subpart."

CEO/President Approval:	CMO Approval:
Date:	Date: