

Blue Water Developmental Housing, Inc.

**HIPAA Security Plan and Assessment
2019 - 2020**



The confidentiality and security of Personal Health Information (PHI) and the transmission of claims for services provided to individuals by Blue Water Developmental Housing, Inc. are assessed yearly. Listed below are the targeted areas of assessment:

Transaction Assessment:

Blue Water Developmental Housing, Inc. (BWDH) utilizes the ANSI X12n 837 electronic format, which is a HIPAA-compliant standard, approved by the Community Mental Health (CMH) and Prepaid Inpatient Health Plan (PIHP) Region 10 for electronic transactions to and from the CMH/PIHP. The data transferred included are claims for individuals receiving services by BWDH. The transferring of data is completed by the Accounts Clerk at the BWDH administrative site located in Marysville MI.

Optimal Alliance Software Information System (OASIS) is the approved software for which BWDH submits HCFA 1500's. 835's are not remitted, nor are 270's. Claims are not printed prior to entry.

There is no committee in place to review claims processing. Community Mental Health will forward claims that are overlapping and/or non-routine. The Division Directors will complete an investigation and document findings based on the investigation.

BWDH has purchased an email encryption through Microsoft which allows any PHI sent via email by the administrative staff is encrypted and not allow breach of information.

Physical Security Assessment:

BWDH, Inc. operates at the administrative site a local area network. All workstations within the administrative office has access to web-based billing. 1 workstation has access to EZ Claim. 2 Workstations have access to the Administrative Services Organization via VPN.

The local server is currently secure and located at the administrative office. The server is housed in a locked room with limited access. The floors are not raised in the server location. Ventilation is currently adequate. Two servers, one switch, one patch panel, on modem and one firewall are present. Access will be determined by the Executive Director.

All workstations throughout the organization have password protection and the password is available for change when requested by the Executive Director. Each workstation is locked when not in physical use and can only be unlocked by the employee assigned to the computer or the administrator.

For all hard copies of PHI located at the administrative office, information is stored in a locked room and in locked cabinets with limited access.

For all hard copies of PHI located at the organizations licensed adult foster care homes, information is stored in a locked room and/or locked cabinets and can only be accessed by the Residential Program Supervisor.

Privacy and Access to Personal Health Information (PHI):

Access to PHI:

Information is disclosed in accordance with business practices and guided by the organizations following policies:

- EA-005 Information Security
- EA-008 Personnel Records
- EA-011 Record Retention
- EA-012 Social Security Number Privacy
- ED-033 Sensitive and Non-Public Information
- EE-004 Technology
- IB-004 Release of Information
- IB- Consumer Records

Disposal of PHI:

Blue Water Developmental Housing, Inc. contracts with Blue Water Secure Shredding whom provides secure document destruction. Blue Water Secure Shredding is a member of the Secure Document Alliance (SDA) and complies with the National Association for Information Destruction (NAID) standards regarding security.

For the administrative office, duplicates of PHI are emptied into locked shredding bin and once a month emptied by Blue Water Secure Shredding.

For the organization's licensed adult foster care homes, PHI is either picked up by or taken to Blue Water Secure Shredding for secure document destruction.

Third Party Access

People who have access to information systems who are not employees include the contract information systems consultants and potentially the janitorial service. The contracted information systems consultants have signed a business associate agreement. Should the janitorial service attempt to access the system, they would be doing so without authorization.

HIPAA Investigations Conducted

A summary of *Investigations Conducted* for the previous fiscal year regarding HIPAA can be found in the organizations Corporate Compliance Plan.