



## **SALISH BHO**

### **HIPAA, 42 CFR PART 2, AND MEDICAID COMPLIANCE STANDARDS POLICIES AND PROCEDURES**

**Policy Name:** COMPLIANCE AND PRIVACY

**Policy Number:** 5.01

**Reference:** 45 CFR 160, 162, and 164; 42 CFR Part 2

**Effective Date:** 4/2016

**Revision Date(s):**

**Reviewed Date:** 6/2017; 5/2018

**Approved by:** SBHO Executive Board

#### **CROSS REFERENCES**

- Policy: Corrective Action Plans
- Kitsap County HIPAA Resolution

#### **PURPOSE**

The Salish Behavioral Health Organization (SBHO) shall comply, and ensure compliance of each of its providers and other subcontractors, with all federal and state privacy regulations, including Health Insurance Portability and Accountability Act (HIPAA) and 42 CFR Part 2.

#### **PROCEDURE**

1. The SBHO does not routinely keep individually identifiable health information.
  - Information in the possession of the SBHO is kept in accordance with HIPAA regulations and is locked with limited staff access.
2. SBHO providers have policies requiring compliance with HIPAA, 42 CFR Part 2, and other privacy regulations.
  - These are reviewed during the Department (State) licensing reviews.
3. The SBHO monitors Ombudsman activities for compliance.

## **MONITORING**

This policy is mandated by contract or statute.

1. This policy will be monitored through use of SBHO:
  - Annual SBHO Provider and Subcontractor Administrative Review.
2. If a provider performs below expected standards during the review listed above, a Corrective Action will be required for SBHO approval. Reference SBHO Corrective Action Policy.