

## **SALISH BHO**

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

**Policy Name:** SBHO Protected Internal Email **Policy Number:** 5.20

Reference: 45 CFR 164; 42 CFR Part 2

Effective Date: 2/2014

Revision Date(s): 5/2016

**Reviewed Date(s):** 12/2014; 5/2016; 6/2017; 5/2018

Approved by: SBHO Executive Board

#### **CROSS REFERENCES**

Policy: Confidential and Security Agreement

### **PURPOSE**

The Salish Behavioral Health Organization (SBHO) shall ensure that internal email between Kitsap County Human Services staff assigned to the SBHO program shall be classified as confidential and protected from public disclosure.

The safekeeping and disclosure of SBHO program information is regulated by state and federal laws because it is public behavioral health program that contains highly sensitive protected health information.

#### **PROCEDURE**

- 1. All email from SBHO program staff shall be classified as confidential according to Kitsap County Information Services policy and procedures (see 5.20a).
- 2. The Kitsap County Information Classification policy applies to all information stored or transported by County computing resources. Use of these resources is governed by the Kitsap County Information Technology Security Policy and Acceptable Use Agreement, regardless of the point of access.
  - Classified confidential means Access is tightly controlled. Unauthorized disclosure may harm public or staff or violate state or federal regulations. Legally excluded from public disclosure.

# **MONITORING**

This policy is a mandate by county policy, state and federal laws.

- 1. This Policy is monitored through use of SBHO:
  - Public Disclosure Requests