



## **SALISH BH-ASO POLICIES AND PROCEDURES**

**Policy Name:** HEALTH INFORMATION SYSTEMS

**Policy Number:** IS600

**Effective Date:** 1/1/2020

**Revision Dates:**

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**Executive Board Approval Dates:** 5/17/2019; 11/1/2019

### **PURPOSE**

Provide Health Information Systems (HIS) to securely collect, maintain, and report data to the HCA, MCOs, and subcontractors at Salish Behavioral Health Administrative Services Organization (SBH-ASO).

### **POLICY**

SBH-ASO has created and maintains the operation of a clearinghouse database which collects and reports data as required by the HCA and the MCOs. The SBH-ASO provides a Managed File Transfer (MFT) server for manual and automated data transfer and submission for our subcontractors. The SBH-ASO hosts a web-based portal for subcontractor use and a public website for the dissemination of information to the general public and providers. SBH-ASO HIS operate in accordance with the Washington State Office of the Chief Information Officer (OCIO) Security Standard 141.10 and HCA Data, Security and Confidentiality requirements.

SBH-ASO subcontractors shall notify SBH-ASO of any change to their information system that will have any effect on the data submitted to, or otherwise required to be collected by, SBH-ASO. Prior to implementing changes to production systems, subcontractors will conduct testing as noted below.

SBH-ASO subcontractors who perform delegated functions will comply with SBH-ASO policies and procedures regarding quality, accuracy, and data reporting, as well as with Health Care Authority (HCA) and OCIO 141.10 policies and procedures.

Periodically, SBH-ASO may receive requests for information from HCA or the MCOs that may not be readily available in the SBH-ASO and require collection of this information from a subcontractor. Subcontractors shall ensure that requested information is received in a manner that will allow SBH-ASO to make a timely response to these inquiries.

## **PROCEDURE**

### **Health Information Systems**

SBH-ASO maintains, and requires its subcontractors to maintain, a health information system that complies with the requirements of OCIO Security Standard 141.10, and HCA Data, Security and Confidentiality requirements, and will provide the information necessary to meet the subcontractor's obligations to SBH-ASO and the HCA. SBH-ASO subcontractors are referred to the OCIO Security Standards (<https://ocio.wa.gov>) and recommended NIST Special Publications (<https://csrc.nist.gov/publications/sp/>) to achieve and maintain compliance with these standards.

SBH-ASO has the following mechanisms in place to verify the health information received from its subcontractors.

### **SBH-ASO Data Dictionary**

The SBH-ASO Data Dictionary is sent to all contracted providers and outlines the supplemental data requirements within the Behavioral Health Data System (BHDS) Data Guide. This set of documents describes the data, format, and content that is to be electronically submitted to SBH-ASO from its subcontractors. SBH-ASO subcontractors will:

1. Provide all applicable data as described in the SBH-ASO Data Dictionary.
2. Implement changes made to the SBH-ASO Data Dictionary in the timeframe required by SBH-ASO.
  - a. In the event short timelines for implementation of changes are required or necessitated by either a court order or agreement resulting from a lawsuit or legislative action, SBH-ASO will:
    - i. provide as much notice as possible of the impending changes
    - ii. provide specifications for the changes as soon as they are available
    - iii. implement the changes required by the timeline established in the court order, legal agreement, or legislative action

### **Encounter Data**

SBH-ASO provides the most current Service Encounter Reporting Instruction (SERI), 837P, 837I, and HIPPA EDI (Electronic Data Interchange) requirements to subcontractors. SBH-ASO provides an MFT for subcontractors to submit encounter data in accordance with contract terms.

SBH-ASO subcontractors will implement changes to the content of national standard code sets (such as Current Procedural Terminology [CPT] Codes, Healthcare Common Procedural Coding System [HCPCS], Place of Service code sets) per the instructions and implementation schedule or deadline from the issuing organization.

## **Testing**

Prior to the implementation of any change which affects the data submitted to SBH-ASO – regardless of whether as a result of SBH-ASO Data Dictionary changes or subcontractor data quality improvement activities – testing must be conducted and successfully completed. Prior to moving changes into production systems, SBH-ASO subcontractors shall submit test batches of the changes to the SBH-ASO Test System. The test batches must be generated from the subcontractor test system and contain a variety of different scenarios related to the changes.

Depending on the testing being done, SBH-ASO will provide a standard batch report and/or detailed analysis of the test batch identifying issues, if any, to the subcontractor. Once SBH-ASO approves testing of batches, the contractor will be allowed to move changes into production systems. SBH-ASO approval will be given after a test batch produces no errors or other mutually agreed upon amount of specific errors.

## **Routine Data Submission**

To support quick and accurate data exchange with subcontractors, SBH-ASO provides both an MFT server and a web-based portal for manual and automated data transfer and verification. The automated processes run daily and verify the accuracy of the data transferred before that data is imported into the database system to maintain the integrity of submitted data and to prevent a failure of the system. Referrals, requests for prior authorizations, claims, and encounter submission, and status updates are included within these portals. These web Portals have been developed using the Open Web Application Security Project (OWASP) web application hardening protocols for added security.

All collected data is made available to HCA, MCOs, and providers upon request and on demand, to the extent permitted by the HIPAA Privacy Rule (45 C.F.R. Part 160, Subparts A and E of Part 164, and RCW 70.02.005). Reporting Servers have been set up specifically for this purpose. Custom reports can be generated and provided as needed and, on an ad-hoc basis.

## **SBH-ASO Website**

The SBH-ASO public website, in accordance with the ADA, provides resources for the public as well as our providers, including our office hours of operation, crisis call number, and available interpreter services and how to locate them. A section for

locating providers along with their available services and service locations is also provided.