



Task	Staff Responsible	Comments	Frequency/ Due Date	Comments
Through the Administrative Review process ensure continuous monitoring of compliance with SBHO Privacy policies throughout network	Martha Crownover	This is on the annual Administrative Review Tool	On-going, annual reviews	
Through the Administrative Review process ensure continuous monitoring of the provider staff are instructed in the confidentiality requirements	Martha Crownover	This is on the annual Administrative Review Tool	On-going, annual reviews	
Through the Administrative Review process ensure continuous monitoring of the provider staff signed statement that acknowledges understanding of requirements in personnel records.	Martha Crownover	This is on the annual Administrative Review Tool	On-going, annual reviews	
Assure all SBHO staff have on file a signed statement that acknowledges understanding of requirements	Alex Hardy	Signed statements for each SBHO staff person will be kept on file by the Administrative Assistant.	Annually	
Designation of Privacy Officer	Martha Crownover	The role of the Privacy person is to be a point of contact for all HIPAA and 42 CFR Part 2 concerns, investigate and report violations, as needed, and maintain up to date trainings and activities.	As needed	
Provision of Training requirements	Martha Crownover	SBHO staff is trained on the HIPAA privacy regulations.	Upon hire and every year after	
Assure all staff who have received HIPAA training have signed a statement acknowledging the training	Martha Crownover	To be completed at the time of training and kept on file with signed statements that acknowledge understanding of requirements	Upon hire and every year after	



Salish BHO Policies and Procedures

Task	Staff Responsible	Comments	Frequency/ Due Date	Comments
Maintain Breach Log and submit to HHS secretary as required.	Martha Crownover	Maintain a Breach Log of any violation of SBHO Privacy Policy and/or any HIPAA/HITECH/42 CFR Part 2 breaches. Includes a risk analysis for any identified breach and notification of the Secretary of HHS as required.	Ongoing maintenance. Annual reporting, or as required.	
Maintain a risk assessment that is updated regularly and as needed.	Martha Crownover	Maintain a current risk assessment report used to mitigate privacy and security issues. This report is reviewed regularly for changes to the process and updated as needed.	Annually and/or as needed.	
Creation and distribution of a privacy and/or security reminder newsletter/flyer.	Martha Crownover and Alex Hardy	To be distributed via e-mail and in routine meetings	Every three months	
Continuous practice of physical safeguards.	All SBHO Staff	Any documentation containing PHI is maintained in a locked file cabinet with keys hidden.	Ongoing	
Posting of Privacy Notice.	Martha Crownover	The SBHO Privacy Notice is posted in a visible area.	Ongoing	
Accounting of Disclosures	Martha Crownover	A file containing a log to document disclosures is maintained by the Administrative Assistant.	Ongoing	
Continuous practice of password protection.	Kitsap County Information Services Department	All SBHO staff have a unique and confidential password to access the SBHO computer systems and e-mail. Passwords are regularly changed (every 60 days) maintain security of the system.	Ongoing.	



Task	Staff Responsible	Comments	Frequency/ Due Date	Comments
Continuous practice of password protection.	Kitsap County Information Services Department	All SBHO staff have a unique and confidential password to access the SBHO computer systems and e-mail. Passwords are regularly changed (every 60 days) maintain security of the system.	Ongoing	
Observation of E-mail confidentiality policies.	All Staff	It is the policy and practice of the SBHO that no e-mail message shall be sent containing PHI unless it is sent with electronic encryption that meets National Institute of Standards and Technology to verify email address. If at any time either a SBHO employee or contactor transmits unencrypted PHI as part of an e-mail message, the SBHO employee shall immediately notify the sending party and the Privacy Officer.	Ongoing	
Observation of Fax confidentiality policies.	All Staff	A HIPAA confidentiality statement is on the SBHO fax cover sheet. Faxes should only be sent with the SBHO fax cover sheet.	Ongoing	
Use of other Electronic Communication.	All Staff	Electronic communications containing PHI may be accomplished using the shared network drive that will be accessible to SBHO staff and provider agencies through the system "Virtual Private Network/Secure Socket Layer system".	Ongoing	
Ensure signed Business Associate Addendum are in place.	Anders Edgerton	Each contract provider must have signed the Business Associate Addendum. The addendums are kept on file at the SBHO office.	Completed	
Website	Anders Edgerton	A Privacy and Security statement is added to the SBHO Behavioral Health webpage within the Kitsap County website.		