

<b>WCHO</b>		<i>Policy and Procedure</i>	
		<i>Information Management.WCHO</i>	
Department: Information Management Author: Teresa Sharp & Michael Harding		Local Policy Number (if used)	
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**I. PURPOSE**

To establish a policy and procedure to assure reliability of data and protection of confidential health information.

**II. POLICY**

It is the policy of the Washtenaw Community Health Organization (WCHO) to protect the confidentiality and security of encounter, demographic, and financial data regarding consumers or services provided through the WCHO, its Affiliates and Network Providers and to manage any development or changes to the data system including report development and all maintenance.

**III. APPLICATION**

All staff of WCHO, its Affiliates and Provider Network.

**IV. DEFINITIONS**

- WCHO                      Washtenaw Community Health Organization
- Electronic Record      The elements of the electronic consumer record contained in Encompass shall consist of the following: Demographics/financial, Emergency Services, Medication Services, Assessment, Health Clinic, ACCESS, Court Services, Legal, Services, Admissions, Budgets, and Other. This record will contain all of these as they pertain to the consumer and the services they receive
- Encompass                The information management system administered by WCHO.
- IM                            The Information Management Department of the WCHO.
- Encompass Liaison      The employee representative who is responsible for ensuring that end users get the support needed to effectively use Encompass.
- Customer                 Any individual or organization that is authorized to use Encompass; such as Community Supports and Treatment Services, affiliate counties, and Public Health.

Report A listing of information from the Encompass system in a manner that allows the customer to analyze their data.

HIPAA: Health Insurance Portability and Accountability Act

**V. STANDARDS**

- A. WCHO Information Management (IM) shall assure that adequate security measures exist to prevent inadvertent or unauthorized access to consumer data; and that data will be maintained, used, and transmitted in HIPAA compliant formats and state-wide standardized codes.
- B. WCHO Information Management will assure reliable data for encounter reporting, data submissions, performance indicators, and various analyses; and to assure compliance with HIPAA regulations by implementing appropriate controls regarding the use of personal and confidential health data regarding individuals receiving WCHO services.
- C. WCHO Information Management upon approval, based on available staff and funding, will offer analysis and design assistance for **reports** to be developed from the WCHO's data system.
- D. WCHO Information Management upon approval, based on available staff and funding, will analyze, design, document and provide training for **modifications** to the Encompass system.
- E. WCHO Information Management shall ensure that all information management practices comply with 45CFR parts 160 & 164 (HIPPA), 42 CFR Part 2 (Substance Abuse), and Michigan Mental Health Code Act 258 of 1974 or any other applicable standards or laws.

**VI. EXHIBITS**

None

**VII. REFERENCES**

Reference:	Check if applies:	Standard Numbers:
42 CFR Parts 400 et al. (Balanced Budget Act)		
45 CFR Parts 160 & 164 (HIPPA)	X	
42 CFR Part 2 (Substance Abuse)	X	
Michigan Mental Health Code Act 258 of 1974	X	
JCAHO- Behavioral Health Standards		
MDCH Medicaid Contract		

MDCH Substance Abuse Contract		
Michigan Medicaid Provider Manual		
PIHP Policy Review Schedule		
Policy Tracking Form		
Washtenaw County Information Technology Policy	X	
WCHO Confidentiality and Access to Clinical Records	X	
WCHO Privacy and Security of Protected Health Information-Consumer Complaints	X	
WCHO Use of Email for Consumer Related Information	X	
HIPAA	X	

## VII. PROCEDURES

<u>WHO</u>	<u>DOES WHAT</u>
(Standard A) WCHO Information Management	<ul style="list-style-type: none"> <li>• Provides user activity related reports to appropriate parties.</li> <li>• Works with Vendor to assure data is transmitted in HIPAA compliant format.</li> <li>• Maintains the standard code list within the electronic record.</li> </ul>
(Standard B) WCHO Information Management	<ul style="list-style-type: none"> <li>• Submits encounter data at least once per month for both substance abuse and mental health.</li> <li>• Works with and provides liaisons reports to assure data is accurate and complete.</li> <li>• Provides consultation when data issues have been identified.</li> </ul>
(Standard C) WCHO Information Management	<ul style="list-style-type: none"> <li>• Consults with Reports Committee to help prioritize and design reports.</li> <li>• Develops reports based on priority.</li> <li>• Gives access to reports.</li> </ul>
(Standard D) WCHO Information Management	<ul style="list-style-type: none"> <li>• Consults with appropriate parties to design an electronic record.</li> <li>• Provides appropriate training necessary for the electronic record.</li> <li>• Provides instruction manuals for users of the electronic record</li> </ul>
Encompass Liaison	<ul style="list-style-type: none"> <li>• Ensures staff are notified on the process to submit report requests and enhancement request.</li> </ul>