



<b>VOLUME 6: HEALTH INFORMATION MANAGEMENT</b>	Effective Date: 01/2002
<b>CHAPTER 2</b>	Revision Date: 08/2016
<b>6.2.1 SECURITY AND PRIVACY POLICY</b>	Attachments: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

**I. POLICY**

California Correctional Health Care Services (CCHCS) Health Information Management (HIM) shall adhere to established rules, guidelines, and statutes that protect patient privacy, confidentiality, security, access to, use, and disclosure of Protected Health Information (PHI). HIM and Health Records shall ensure:

- Strong encryption in storage and data pathways leading internally and externally.
- Integrity of PHI and identification of any PHI tampering.
- Availability of PHI at all times with proper performance measures to ensure easy accessibility, including backup and restore operation.
- Capability of storing information pursuant to retention requirements.
- Periodic management review of security for necessary changes as a result of technology evolution.
- Periodic risk assessments conducted by management to ascertain the threats and vulnerabilities that impact CCHCS and HIM assets, and implement appropriate mitigations.

**II. PURPOSE**

To ensure protection of patient, privacy, security, access to, use, and disclosure of PHI.

**III. DEFINITIONS**

**Protected Health Information:** Information created or received by CCHCS which identifies or can be used to identify an individual as it relates to past, present, or future health conditions; health care services provided to the individual; or health care related payments. This applies to information that is transmitted or maintained in verbal, paper, or electronic form.

**IV. RESPONSIBILITIES**

- A. The Chief Executive Officer or designee, Health Records Technician III, and Health Records Technician II of each institution are responsible for the implementation, monitoring, and evaluation of this policy.
- B. The CCHCS Information Security Officer shall validate the security component for access to electronically stored PHI.

**V. REFERENCES**

- California Civil Code, Sections 56-56.37, Medical Information Confidentiality
- California Health and Safety Code, Sections 1275-1289.5, Health Facilities Data Breach
- Health Insurance Portability and Accountability Act, Summary of HIPAA Privacy Rules
- Health Insurance Portability and Accountability Act, Summary of HIPAA Security Rules
- Health Insurance Portability and Accountability Act, Protected Health Information

# **CALIFORNIA CORRECTIONAL HEALTH CARE SERVICES**

- Summary of Changes to State Administrative Manual, Section 4842.1 Risk Analysis
- Clark M., Gregg C., Hughes G., Lessig R., Morris D., & Wieland L. (2001) Documentation for ambulatory care (Revised ed.). American Health Information Management Association. Chicago, IL
- California Correctional Health Care Services, Inmate Medical Services Policies and Procedures, Volume 13, Privacy