



| POLICY AND PROCEDURE | |
|-----------------------------|-------------------------------------|
| SUBJECT/TITLE: | HIPAA Privacy and Security Policies |
| APPLICABILITY: | All Staff |
| CONTACT PERSON & DIVISION: | Diane Thompson, Director of Nursing |
| ORIGINAL DATE ADOPTED: | 01/14/2016 |
| LATEST EFFECTIVE DATE: | 05/21/2018 |
| REVIEW FREQUENCY: | 3 years |
| BOARD APPROVAL DATE: | 05/21/2018 |
| REFERENCE NUMBER: | 800-016-P |

A. PURPOSE

The purpose of this policy is to implement the provisions of the Health Insurance Portability and Accountability Act (HIPAA) of 1996, codified in sections 42 USC 1320-1320d-8.

B. POLICY

The operations of the Canton City Health District (CCHD) will be in compliance with the Health Insurance Portability and Accountability Act (HIPAA) of 1996 as codified in sections 42 USC 1320-1320d-8. The CCHD will take all reasonable steps to assure client access to protected health information collected by the CCHD and will also protect unauthorized access to any protected health information. The HIPAA Privacy and Security Policies are adopted by reference to the document referenced in 800-016-01-A_HIPAA Privacy and Security Policies. HITECH Act, Omnibus Rule Complaint, Version 4.0, Updated August 2015.

Any agency that has access to the CCHD facilities exclusively for the purposes of performing duties in the service agreement and is expressly prohibited from accessing any electronic equipment or reading any information regarding patient care is required to sign 800-016-02-F_Confidentiality Agreement for Outside Agency.

Any CCHD full-time, part-time, seasonal or intermittent employee, subcontracted CCHD employee, visiting professional, work study student, intern, Board of Health member, any City of Canton employee who performs work at the CCHD and/or other CCHD employees as approved by the Health Commissioner is required to sign 800-016-03-F_Employee Confidentiality Agreement.

Any agencies that qualify as a business associate (refer to HIPAA policy, 800-016-01-A, 1370 Business Associate and other Confidentiality Contracts and Appendix A – Identifying Business Associates) should complete the Business Associates Agreement.

C. BACKGROUND

This is a large and complicated policy. The policy was developed in 2015 by a contractor (Eagle Consulting). The format and structure of his policy does not conform to the normal policy format standards of the department as outlined in 800-001-P. Due to the complexity of this policy, this non-standard format will be utilized as a substitute format.

D. GLOSSARY OF TERMS

See 800-016-01-A for a glossary of terms.

E. PROCEDURES & STANDARD OPERATING GUIDELINES

See 800-016-01-A for procedures and standard operating guidelines.



Public Health
Prevent. Promote. Protect.
Canton City Health District

Canton City Health District
All
FINAL

F. CITATIONS & REFERENCES

N/A.

G. CONTRIBUTORS

The following staff contributed to the authorship of this document:

1. Diane Thompson, Director of Nursing
2. James Adams, Health Commissioner
3. Eagle Consulting

H. APPENDICIES & ATTACHMENTS

800-016-01-A_HIPAA Privacy and Security Policies. HITECH Act, Omnibus Rule Complaint, Version 4.0, Updated May 2018

800-016-02-F_Confidentiality Agreement for Outside Agency

800-016-03-F_Employee Confidentiality Agreement

I. REFERENCE FORMS

See appendix A for reference forms.

J. REVISION & REVIEW HISTORY

| Revision Date | Review Date | Author | Notes |
|---------------|-------------|--------|-------|
| | | | |

K. APPROVAL

This document has been approved in accordance with the “800-001-P Standards for Writing and Approving PPSOGFs” procedure as of the effective date listed above.