

APPENDIX A

Identification of Affected Workforce Member's Access To Protected Health Information.

- (1) Physician: A physician must have access to all protected health information of patients and clients of Ottawa County to whom he/she is providing services. There are no conditions applicable to that access.
- (2) Psychologist: A psychologist must have access to all protected health information of patients and clients of Ottawa County to whom he/she is providing services. There are no conditions applicable to that access.
- (3) Clinical Staff of Community Mental Health Agency: The Clinical Staff of Community Mental Health must have access to any and all protected health information concerning patients or clients of Ottawa County to whom he/she is providing service. There are no conditions applicable to that access. She/he must have access to billing information concerning a patient or client if the Billing Clerk must discuss billing matters concerning that patient with the members of the Clinical Staff.
- (4) Registered Nurse: A Registered Nurse must have access to all clinical information of patients or clients to whom she/he is providing services. There are no conditions applicable to that access. She/he must have access to billing information concerning a patient or client if the Billing Clerk must discuss billing matters concerning that patient with the Registered Nurse.
- (5) Clinical Staff of Health Department: A member of the Clinical Staff of the Health Department must have access to all clinical information of patients or clients to whom he/she is providing services. There are no conditions applicable to that access. She/he must have access to billing information concerning a patient or client if the Billing Clerk must discuss matters concerning that patient with the member of the clinical staff.

- (6) Accounting Records
(Accounting Department): Accounting Personnel of the Accounting Department must have access to all billing and payment information concerning the patient or client. There are no conditions applicable to that access. She/he must have access to clinical information concerning the patient to the extent necessary to bill for services provided to the patient or client.
- (7) Accounting Records
(Community Mental Health): Accounting Personnel at the Community Mental Health Agency must have access to all billing and payment information concerning the patient or client. There are no conditions applicable to that access. She/he must have access to clinical information concerning the patient to the extent necessary to bill for services provided to the patient or client.
- (8) Accounting Records
(Health Department): Accounting Personnel at the Health Department must have access to all billing and payment information concerning the patient or client. There are no conditions applicable to that access. She/he must have access to clinical information concerning the patient to the extent necessary to bill for services provided to the patient or client.
- (9) Receptionists (Community Mental Health Agency, Health Department, Human Resources Department): The Receptionists must have access to the names of all patients or clients and of their personal representatives. There are no conditions applicable to that access.
- (10) Classified and Unclassified Employees Performing Secretarial Services: Classified and Unclassified Employees in the Community Mental Health Agency, the Health Department, and the Accounting Department who provide secretarial services for clinical staff and billing staff must have access to all patient records, client records, and billing records as directed by their respective supervisors and within the range of services to be provided under their job descriptions.
- (11) Corporation Counsel and Unclassified Employees of Corporation Counsel and all Unclassified Employees of the Office of the Corporate Counsel must have access to

- Office of Corporate Counsel: all patient, client, and billing records as may be necessary to fully perform their functions and duties, including any assigned duties within that Office to act as Chief Privacy Officer under this Policy.
- (12) County Administrator: Must have access to all patient and client clerical and billing records as may be necessary to fully perform his or her functions to administer the operations of County Government and to oversee implementation and compliance with this Policy.
- (13) Unclassified Employees of the County Administrator's Office: Must have access to all patient and client and billing records as may be necessary to assure performance of the Administrator's duties.
- (14) County Finance Director: The County Finance Director must have access to all billing and payment information concerning the patient or client. There are no conditions applicable to that access. She/he must have access to clinical information concerning the patient to the extent necessary to bill for services provided to the patient or client.
- (15) Unclassified Employees of County Finance Director: Must have access to all patient, and client billing records and payment information as may be necessary to assure performance of the County Finance Director's duties.
- (16) County Accounting Director: Must have access to all billing and payment information concerning the patient or client. There are no conditions applicable to that access. She/he must have access to clinical information concerning the patient or client to the extent necessary to bill for services provided to the patient or client.
- (17) Unclassified and Classified Employees of County Accounting Department: As directed by the County Accounting Unclassified must have access to all billing and payment information concerning the patient or client she/he must have access to clinical information concerning the patient to the extent necessary to bill for services provided to the patient or client.
- (18) Director of Human Resources: Must have access to all enrollment, billing and payment information concerning employees and other persons covered by the Ottawa County Health insurance, disability insurance, worker's disability compensation insurance, vision insurance, and other similar programs. She/he must have access to clinical information concerning

the person to the extent necessary to administer Ottawa County insurance and health programs for persons covered there under.

- (19) Classified and Unclassified Employees of County Human Resources Department: Must have access to all enrollment, billing, and payment information concerning employees and other persons covered by Ottawa County health insurance, disability insurance, worker's disability compensation insurance, vision insurance, and other similar programs. She/he must have access to clinical information concerning the person to the extent necessary to administer Ottawa County insurance and health programs for persons covered there under.
- (20) Executive Director of Community Mental Health: Must have access to all clinical, billing, and accounting records for the patient or client. There are no restrictions on this right of access.
- (21) Community Mental Health Agency Executive Staff: As directed by the Executive Director, must have access to all clinical, billing, and accounting records for the patient or client. There are no restrictions on this right of access.
- (22) Ottawa County Health accounting Officer: Must have access to all clinical, billing and records for the patient or client. There are no restrictions on this right of access.
- (23) Classified/Unclassified Employees in Community Mental Health Agency: As directed by the Executive Director of the Community Mental Health Agency, must have access to all patient or client clinical and/or billing records to assist Executive and Clinical Staff in the performance of their duties.
- (24) Classified/Unclassified Employees in the Health Department: As directed by the Health Officer, must have access to all patient or client clinical and/or billing records to assist in the performance of Health Department duties.
- (25) Director of MIS Department: Must have access to all patient, client or employee billing and accounting records to perform computerized billing and accounting services. May need to know specific clinical information to assure proper performance of MIS functions.
- (26) Classified and Unclassified Employees of MIS engaged In Computerized Billing: Must have access to all billing and accounting records to perform computerized billing and accounting services.

(27) Cleaning Staff:

The Janitorial staff does not need access to any protected health information concerning any patient, client, employee, or person covered by any insurance program of Ottawa County.

APPENDIX B

Safeguards to Protect the Privacy of Protected Health Information

(1) Computers.

- (a) All computers must have screen savers that activate after ten minutes of inactivity. The screen saver must require the employee's pass word to be de-activated.
- (b) All employees must change their passwords at least every ninety (90) days.
- (c) No protected health information may be removed from the office on computer disk without the prior approval of the Chief Privacy Officer or his/her designee. When removal is permitted, the disk shall be encrypted and password protected.

(2) Trash.

All trash that contains protected health information must be placed in the designated receptacles to be shredded. The designated receptacles shall be located only in office rooms that can be locked when the office is closed.

(3) Files.

- (a) During the workday, files containing protected health information shall remain in the appropriate file drawers except when being used. When being used, the person who removes the file shall place a file divider at the location of the file in the file drawers indicating that the file is with that person. At the end of the work day, all files containing protected health information shall be returned to the appropriate file drawers.
- (b) When the office is closed, all file drawers containing protected health information shall be locked.
- (c) Any charts being transported in a motor vehicle outside of the office, shall be transported in the trunk of the vehicle. If the vehicle does not have a trunk, charts shall be transported in a locked container which does not identify the contents as patient or client charts.

(4) Faxes.

- (a) Received Faxes.

The Secretary shall remove all received faxes from the fax machine promptly upon the faxes' receipt and deliver the fax to the intended recipient. If delivery cannot be accomplished immediately, the Secretary shall maintain the faxes in a confidential file until delivery is accomplished.

At the end of the workday, the Secretary shall remove all paper from the fax machine, or the fax machine must be located in a secure area.

(b) Sending Faxes.

All faxes must be sent with a fully completed Ottawa County cover sheet. The fax number to which the material is being faxed shall be highlighted and double checked before being sent.

Faxes containing patient or client records or information may be sent only by a person authorized to send Faxes.

(5) General.

All areas where protected health information is stored, kept, or accessed for work purposes shall be posted as restricted areas and shall not be open or accessible to the general public or to any unauthorized persons.

APPENDIX C

Protocols for Routine and Recurring Requests by Ottawa County

(1) Requests for Information When Receiving a Referral.

The information requested should be limited to the patient or client's name, address, telephone number, diagnosis, present condition, and the services required.

(2) Requests for Information to Verify Insurance Coverage.

The information requested should be limited to the patient or client's name, address, telephone number, diagnosis, present condition, the services required, insurance identification numbers, and, for group insurance, the name of the person who holds the coverage.

APPENDIX D

Protocols for Routine and Recurring Disclosures

(1) Disclosure for Referral of Patient or Client to Nursing Home or Group Home.

The information disclosed should be limited to the patient or client's name, address, telephone number, diagnosis, present condition, and the services required.

(2) Disclosure for Insurance Reimbursement.

The information disclosed should be limited to the patient's or client's name, the insurance enrollee's name, the insurance numbers, any additional insurance name and numbers, dates of service, diagnosis, date of birth, date of death if applicable, visit notes, and the charges for services.

APPENDIX E

Fees for Copies of Protected Health Information

The Ottawa County Board of Commissioners may by Resolution, set a reasonable cost based fee for providing copies of Protected Health Information provided the fee includes only:

- a. Copying, including the cost of supplies for and labor of copying, the protected health information requested by the individual;
- b. Postage, when the individual has requested the copy, or summary or explanation, be mailed; and,
- c. Preparing an explanation or summary of the protected health information, if agreed to by the individual (as required by the privacy rule).

The Ottawa County Board of Commissioners may amend the Fee Schedule as necessary to reflect changes in the cost of preparing copies of Protected Health Information. Fees for the cost of copies may be calculated under the Ottawa County “Freedom of Information Act Policy”.

APPENDIX F

Fees for Accounting

- For the first accounting in a twelve (12) month period - No Charge.
- For the second or greater accounting in a twelve (12) month period - \$10.00.