

# Michigan Community Services, Inc.

## *Security Policy*

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### **Introduction**

MCSI has adopted this Security Policy to comply with our duties under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), the Department of Health and Human Services (“DHHS”) security and privacy regulations. MCSI has a duty to protect the confidentiality and integrity of confidential information as required by law and professional ethics. All personnel of MCSI must comply with this policy. Familiarity with this policy and demonstrated competence in the requirements of this policy are an important part of every employee’s responsibilities.

This Security Policy is based on the following assumptions:

- All personnel of MCSI must preserve the integrity and the confidentiality of information pertaining to our consumers.
- The purpose of this Security Policy is to ensure that MCSI and its officers, employees, and agents have the necessary information to provide the highest quality care possible while protecting the confidentiality of that information to the highest degree possible.

### **Policy**

MCSI and its officers, employees, and agents will-

- Collect and use individual information only for the purposes of providing services and for supporting the delivery, payment, integrity, and quality of those services. MCSI and its officers, employees, and agents will not use or supply individual information for non-health care uses, such as direct marketing, employment, or credit evaluation purposes other than as authorized by the Department of Health and Human Services (“DHHS”) privacy regulations.
- Collect and use individual health information only—
  - To provide proper treatment.
  - With the individual’s knowledge and consent/authorization.
  - To receive reimbursement for services provided.
  - As a basis for required reporting of information to contract agencies.
- Recognize that medical information collected about consumers must be accurate, timely, complete, and available when needed. Consequently, MCSI and its officers, employees, and agents will—
  - Use their best efforts to ensure the accuracy, timeliness, and completeness of data and ensure that authorized personnel can access data when needed.
  - Complete all documentation in accordance with the law, ethics, and accreditation standards.

- Not alter or destroy an entry in a record, but rather designate it as an error while leaving the original entry intact and create and maintain a new entry showing the correct data.
- Implement reasonable, cost-effective measures to protect the integrity of all data maintained about consumers.
- Recognize that consumers have a right to privacy. MCSI and its officers, employees, and agents will respect consumer's privacy to the extent consistent with providing the highest quality care.
- Act as responsible information stewards and treat **all** individual personal health and related financial, demographic, and lifestyle information as sensitive and confidential. Consequently, MCSI and its officers, employees and agents will—
  - Treat all individual data, called “protected health information” (“PHI”), as confidential in accordance with the DHHS privacy regulations, other legal requirements and professional ethics.
  - Use or disclose only the minimum necessary health information to accomplish the particular task for which the information is used or disclosed.
  - Not divulge protected health information unless the consumer (or his or her authorized representative) has properly consented to the release or the release is otherwise authorized by the privacy regulations and/or other law.
  - When releasing protected health information, take appropriate steps to prevent unauthorized redisclosures.
  - Implement reasonable, cost-effective measures to protect the confidentiality of medical and other information maintained about consumers.
  - Not disclose financial or other consumer information except as necessary for billing or other authorized purposes as authorized by the privacy regulations, other laws, and professional standards.
  - Other than for treatment purposes or when authorized by the consumer or guardian, do not use or disclose more information than the minimum necessary health information to accomplish the particular task for which the information is used or disclosed.
  - Recognize that, MCSI and the consumer has a right of access to information contained in the record. MCSI and its officers, employees, and agents will—
    - Provide consumers and/or legal guardian a notice of information practices that details their rights, our duties, and how we will use and disclose their PHI in accordance with the requirements of the privacy regulations.
    - Permit consumers and/or legal guardian to access and copy their PHI in accordance with the requirements of the privacy regulations.
    - Provide consumers and/or legal guardian an opportunity to request correction of inaccurate data in their records in accordance with the requirements of the privacy regulations.

- Provide consumers and/or legal guardian an accounting of uses and disclosures other than those for treatment, payment, and health care operations and those that they have consented to or authorized in accordance with the requirements of the privacy regulations.
- Permit consumers and/or guardians to request restriction on the use and disclosure of their PHI and to request alternate forms of communications in accordance with the requirements of the privacy regulations.

### **Enforcement**

All officers, agents and employees of MCSI **must** adhere to this policy, and all supervisory and management staff are responsible for enforcing this policy. MCSI will not tolerate violations of this policy. Violation of this policy is grounds for disciplinary action, up to and including termination of employment and criminal or professional sanctions in accordance with MCSI's personnel rules, regulations and disciplinary action policies.