

**COUNTY OF IMPERIAL
DEPARTMENT OF BEHAVIORAL HEALTH SERVICES**

POLICY AND PROCEDURE MANUAL

SUBJECT: HIPAA - PHI Inventory	PROCEDURE: 01-163
SECTION: Administration	EFFECTIVE DATE: 6-8-16
REFERENCE:	PAGE: 1 of 5
AUTHORITY: Behavioral Health Director as the Local Mental Health Director and Alcohol and Drug Administrator	SUPERSEDES: New Procedure
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PURPOSE: To establish procedures to keep all tangible and electronic Protected Health Information (PHI and ePHI). To establish the devices, applications, and locations that store and process PHI.

NOTES: The Security Officer is responsible for overseeing and retaining annual inventories and for approving the applications that are used to create, read, update, delete, store and transmit ePHI.

The Systems Technology Analyst is responsible for records that identify and describe IT equipment, devices, and software. The Systems Technology Analyst oversees that Systems Technology technicians in conjunction with the Information Systems Analyst are responsible for recording who is assigned to equipment and devices.

The Systems Technology Technician is responsible for installing and recording the physical location of each fixed device.

The Information Systems Office Technician is responsible for entering reported information of asset location into ICBHS asset inventory database.

practices for children, youth and young adults and adults receiving medication support services.

DEFINITIONS: **EPHI - Electronic protected health information:** refers to any protected health information (PHI) that is covered under Health Insurance Portability and Accountability Act of 1996 (HIPAA) security regulations and is produced, saved, transferred or received in an electronic form.

ICBHS: Imperial County Behavioral Health Services

ICBHS Asset Inventory: Is the entire physical inventory of the ICBHS information technology infrastructure equipment that may include but is not limited to: hardware, software, networks, and related equipment used to develop, test, operate, monitor, manage and/or support information technology.

Information Systems Analyst: Information Systems Analyst is computer systems analyst who works with ICBHS' current computer systems and solutions to help the organization operate more efficiently and effectively.

IS: Information Systems

PHI Inventory Workbook: Is a collection and documentation of the Inventory of "Protected Health Information" that that is necessary to meet the requirements of the HIPAA security and Privacy Rules.

Systems Technology Analyst: Systems Technology Analyst systems analyst is an information technology (IT) professional who specializes in analyzing, designing and implementing information systems.

Policy Owner: Security Officer

PROCEDURE:

PERSON RESPONSIBLE:

ACTION:

Initializing the Inventory:

System Technology Analyst/
Information Systems Analyst

1. Document a list of all applications that store and process EPHI on the PHI inventory workbook. The list will include:
 - a. application name,
 - b. store or process of EPHI,
 - c. function,
 - d. software category,
 - e. administrative person of contact,
 - f. vendor,
 - g. number of licenses,
 - h. license point of contact.

NOTE: No ePHI will be stored on desktops, any ePHI that is essential to be kept will be preserved using the secure network shared drive.

System Technology Analyst

2. Documents a list of current fixed devices and includes data in PHI inventory workbook.
 - a. Obtains updated ICBHS asset inventory data from IS Office Technician.

System Technology Analyst
(cont.)

- b. Filters data and generates a list of all current fixed devices.
- c. Adds list in Excel sheet to PHI Inventory Workbook.

3. Document a list of mobile devices and include data in PHI inventory workbook.

- a. Using data obtained from ICBHS asset inventory, filter mobile device data.

- b. Generate a list of all current mobile devices.

- c. Add list in excel sheet to PHI inventory workbook.

4. Inventories non-digital PHI including, but not limited to:

- a. Annually send the PHI Inventory form, found in attachment I, to all managers.

Manager

- b. Completes form and forwards to Information Systems Analyst.

Information Systems
Analyst

- c. Generates and maintains the PHI inventory within the PHI Inventory Workbook and will include:

- 1) Location of PHI

- 2) Site name

- 3) Description of Repository

Information Systems

Analyst (cont.)

- 4) Description of PHI type
- 5) Secure status
5. Documents site inventory
 - a. Obtains current ICBHS Site Map from IS Analyst.
 - b. Generates list of all sites.
 - c. Adds list in excel sheet to PHI inventory workbook.
 - d. Obtains site maps from purchasing department and/or each division.
 - e. Adds site map for each division onto PHI inventory workbook.
6. Uploads completed PHI inventory onto the Security Document Library at the *HIPAA HITECH EXPRESS* online application.

Related Policies and Regulations

Regulations:

1. 45 C.F.R. Section 164.306(a)(1) Security standards: Ensure the confidentiality, integrity, and availability of all electronic protected health information the covered entity creates, receives, maintains, or transmits.