

**BLUE WATER DEVELOPMENTAL HOUSING, INC.
POLICIES AND PROCEDURES: EMPLOYEE INFORMATION**

SUBMITTED BY: Jennifer Stringer	DATE SUBMITTED: 06/23/2016	SECTION: Administrative	
BOARD APPROVED ON: 9/14/16	DATE REVISED: 09/16/2020	SUBJECT: Information Security	
ANNUAL REVIEW BY EXECUTIVE DIRECTOR: 10/19/16, 11/21/18, 09/16/2020, 9/16/2022		POLICY #: EA-005	PAGE #: 1 of 4

I. APPLICATION

The provisions stated herein shall apply to all employees of Blue Water Developmental Housing, Inc. (BWDH).

II. POLICY

It is the policy of Blue Water Developmental Housing that protected health information (PHI) obtained in relation to the individuals served, employees and/or volunteers be kept secure and maintained in such a manner that is compliant with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Health Information Technology for Economic and Clinical Health Act (HITECH) requirements. This policy will address the following:

- a) Confidential administrative records
- b) The records of the persons served
- c) Security of all records
- d) Confidentiality of records
- e) Compliance with applicable laws concerning records
- f) Time frames for documentation in the records of the persons served

III. DEFINITION

Protected Health Information: refers to demographic information (such as age, sex, race, and occupation), financial information (such as employment status, income, disabilities and participation in state or federal programs), medical information (such as diagnosis, treatments, and disease histories including mental illness, drug or alcohol dependency, AIDS and/or sexually transmitted diseases), and social information (such as family and/or lifestyle choices).

Health Insurance Portability and Accountability Act of 1996 (HIPAA): a US law designed to provide privacy standards to protect patients' medical records and other health information provided to health plans, doctors, hospitals and other health care providers.

Health Information Technology for Economic and Clinical Health Act (HITECH): promotes the adoption and meaningful use of health information technology. Addresses the privacy and security concerns associated with the electronic transmission of health information, in part, through several provisions that strengthen the civil and criminal enforcement of the HIPAA rules.

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Sensitive information: can only be released to the subject of the information and to those within the organization who have a legitimate need-to-know, outside entities with the subject's written permission, and others as allowed by law. Sensitive information consists of person information including, but not limited to:

- Social security number or other taxpayer ID
- Employee ID
- Birth Date
- Home phone number
- Home address
- Personal contact information
- Education and training
- Previous work experience
- Job description
- Non-salary financial information
- Benefits information
- Health records
- Passwords
- Gender or Gender Identity
- Ethnicity
- Citizenship
- Citizen visa code
- Veteran and disability status
- Performance reviews or disciplinary actions
- Payroll time sheets
- Worker's compensation or disability claims

1. Personal Information

- Credit Card Information: credit card number (in part or whole), expiration date, cardholder name and/or address and security code
- Tax Identification Numbers: social security number, insurance card number and business/employer identification number
- Payroll Information: paychecks, pay stubs and pay rates
- Cafeteria plan check requests and associated paperwork
- Medical information for any employees or customers including but not limited to: doctor names and claims, insurance claims, prescriptions and any related personal medical information

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- Other personal information belonging to customers, employees and contractors: Examples include name, date of birth, address, phone number, maiden name and customer name.

2. Administrative Information

- Employee, customer, vendor, supplier confidential information, proprietary information or trade secrets.
- Proprietary and/or confidential information, among other things, includes: business methods, customer utilization information, retention information, sales information, marketing and other BWDH strategy, computer codes, screens, forms, information about or received from, BWDH's current, former and prospective employees, sales associates or suppliers or any other non-public information. Proprietary and/or confidential information also includes the name and identity of any customer or vendor and the specifics of any relationship between and among them and the BWDH.

3. Any document marked "Confidential", "Sensitive", "Proprietary", or any document similarly labeled.

Encryption: is the translation of data into a secret code. Encryption is the most effective way to achieve data security. To read an encrypted file, employees must have access to a secret key or password that enable them to decrypt it. Unencrypted data is called plain text.

Hard Copy: a printout of data stored in a computer. A printout is considered "hard" because it exists physically on paper, whereas a "soft" copy exists only electronically.

Every employee and contractor performing work for BWDH will comply with the following:

- File cabinets, desk drawers, overhead cabinets, and any other storage space containing documents with sensitive information will be locked when not in use.
- Storage rooms containing documents with sensitive information and record retention areas will be locked at all times except when in use.
- Desks, workstations, work areas, printers, and fax machines, and common shared work areas will be cleared of all documents containing sensitive information when not in use.
- Whiteboards, dry-erase boards, writing tablets, etc. in common shared work areas will be erased, removed, or shredded using a mechanical shredder.
- When documents containing sensitive information are discarded they should be immediately shredded using a mechanical shredder.

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Every employee and contractor performing work for BWDH will comply with the following policies and procedures for electronic distribution:

- Any sensitive information submitted internally is encrypted and may be transmitted using approved company e-mail.
- Any sensitive information submitted externally by e-mail may be transmitted using approved company e-mail and should contain a statement such as:

“This message may contain confidential and/or proprietary information and is intended for the person/entity to whom it was originally addressed. Any use by others is strictly prohibited.”

BWDH personnel are encouraged to use common sense judgement in securing BWDH Confidential Information to the proper extent. If an employee is uncertain of the sensitivity of a particular piece of information, the employee should contact their supervisor.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

IV. NOTIFICATION/PROCEDURE

WHO

Designated HIPAA compliance officers, residential and community services division directors

DOES WHAT

1. Reviews and monitors compliance with HIPAA regulations.
2. Conducts annual audits on necessary postings in all BWDH facilities.
3. In the event of a breach of privacy, will meet with the Executive Director to investigate breach and develop an action plan.
4. Audit and maintain employee files to determine levels of access.