

Cornerstone Behavioral Healthcare

PM.36 Protected Health Information Policy

Logins

Cornerstone Behavioral Healthcare (CBH) uses an Electronic Health Records (EHR). As a requirement of this process, employees have a unique login. Employees are not to share or divulge their login information to any other individuals or employees. If an employee is found to have knowingly shared their login information, disciplinary action may occur. If security is breached or compromised, then all previous electronic signatures applied by an employee in the EHR must be deleted and applied again under a new secure login.

Electronic Signatures

All of the required forms that comprise the client record will be created digitally and can be signed electronically as required. Electronic signatures do not apply to existing paper records. The electronic signature standard affords a reliable method of assuring integrity, user authentication, and non-repudiation—all required by The Health Insurance Portability and Accountability Act (HIPAA). This means that the protected health information (PHI) in a release of information, for example, is secure, the sender can be confirmed, and because of the uniqueness of the electronic signature, there can be no question that the message was sent by the signatory. Moreover, a tamper-seal will detect any change(s) after signing, which, in turn, invalidates the electronic signature in that particular communication. When an electronic signature is applied to a document, it signifies and preserves the signer's intent, consent, understanding, or responsibility related to that document.

Accessing Client Records

CBH provides an EHR in accordance with CMS guidelines. Employees must access patient information on a *need-to-know* basis only, accessing only information required to provide client care or complete their work. Accessing information for any other reason is prohibited. CBH has a *no tolerance* policy in connection with the management of patient health records in electronic and paper format. If an employee is found to be accessing patient health information not in accordance with these guidelines, their employment will be immediately terminated.

When an employee becomes aware that a close friend or family member is a client of CBH, it is the employee's responsibility to bring this to the attention of their supervisor and explain the relationship. The supervisor blocks the employee from the chart and notifies the CEO and Clinical Director of the relationship, and a determination will be made about whether the employee will stay blocked from the chart or be unblocked.

See Section 16.E for additional information about accessing client records.

HealthInfoNet (HIN) Portal Access

CBH, in conjunction with HIN, provides access to the online Health Information Exchange (HIE) to employees on an as-needed basis. Employees must access patient information on a need-to-know basis,

Cornerstone Behavioral Healthcare

PM.36 Protected Health Information Policy

accessing only information required to provide client care or complete their work. Accessing information for any other reason is prohibited. CBH has a “no tolerance” policy in connection with access of the online portal. If an employee is found to be accessing patient health information outside of these guidelines, their employment will be immediately terminated.

Other Online access to Protected Health Information

CBH uses multiple online services to access client information, for example: insurance and authorization portals. Employees must access patient information on a need-to-know basis, accessing only information required to provide client care or complete their work. Accessing information for any other reason is prohibited. CBH has a “no tolerance” policy in connection with access of online portals. If an employee is found to be accessing patient health information outside of these guidelines, their employment will be immediately terminated.

Remote and Off-Site Work

Any paperwork or computer work done outside the office must also comply with all safeguards above in order to protect PHI.

Frank Willard

CEO

07/01/2025

Date