

Cornerstone Behavioral Healthcare

PM.36 Protected Health Information Policy

Logins

Cornerstone Behavioral Healthcare (CBH) uses an electronic health record system (EHR). Any EHR requires each employee to have a unique login. Employees are not to share or divulge their login information to any other individual(s) or employee(s). 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).

Accessing Client Records

CBH provides an EHR in accordance with CMS guidelines. Employees must access client 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 zero-tolerance policy in connection with the management of client health records in electronic and paper format. If an employee is found to be accessing client health information not in accordance with these guidelines, their employment will be immediately terminated. See Section 16.E for additional information about accessing client health records.

When an employee becomes aware that a close friend or family member is a client of CBH, it is the employee's responsibility to tell their supervisor of the relationship. The supervisor blocks the employee from the chart if they are able, or asks the Medical Records Supervisor to do the block if they are not. The supervisor then 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.

When CBH becomes aware that an employee is also a client, whether at the commencement of employment or during employment, chart settings will be implemented to restrict access to the employee's chart. The chart will not be visible to the employee or to other staff, except those with a legitimate clinical or administrative need related to the employee's care or account.

HealthInfoNet (HIN) Portal Access and Other Online Access to PHI

CBH, in conjunction with HIN, provides access to the online Health Information Exchange (HIE) to employees on an as-needed basis. In addition, CBH uses multiple online services to access client information (e.g., insurance and authorization portals). Authorization is granted to employees on a need-to-know basis, allowing access only to information required to provide client care or complete their work. Accessing information for any other reason is prohibited. CBH has a zero-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, employment will be immediately terminated.

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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.

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CEO

Date