

CHELAN-DOUGLAS RSN/PIHP POLICY AND PROCEDURE MANUAL		Chapter:	1.4.2.26
Title:	HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT	Page:	1 of 3
		Date Effective:	December 5, 2011
Subject:	Private Pay PHI		
		Authorizing Signature:	

SCOPE This policy applies to Chelan-Douglas Regional Support Network/Prepaid Inpatient Health Plan (Chelan-Douglas RSN/PIHP) and its subcontractors and Business Associates.

POLICY

- I. Use of Information Related to Services Not Funded by the Chelan-Douglas RSN/PIHP.
 1. Chelan-Douglas RSN/PIHP does not use or disclose PHI related to services not funded by the Chelan-Douglas RSN/PIHP, except as delineated in any existing Business Associate Agreement with the contracted service provider from whom the consumer is receiving or has received services.
 2. Only PHI related to consumers who have or had a relationship with a Chelan-Douglas RSN/PIHP contracted provider and are receiving or have received services funded by the Chelan-Douglas RSN/PIHP will be transmitted to and/or maintained by the Chelan-Douglas RSN/PIHP.
 3. Chelan-Douglas RSN/PIHP shall exclude PHI not related to services funded by the Chelan-Douglas RSN/PIHP from all reports, including both detail and aggregate reports, that display consumer identifiers as defined in Policy and Procedure 1.4.2.
 4. Chelan-Douglas RSN/PIHP staff shall access PHI maintained by the Chelan-Douglas RSN/PIHP related to consumers receiving services that are not funded by the Chelan-Douglas RSN/PIHP only in a manner allowable under an existing Business Associate Agreement, and as required for healthcare operations.
 5. Services that are retroactively covered by the Chelan-Douglas RSN/PIHP due to a consumer receiving retroactive Medicaid coverage shall be considered Chelan-Douglas RSN/PIHP funded

services, and PHI related to such services shall be excluded from this policy as of the date of Medicaid coverage effective date.

- II. Data Transactions Related to Services Not Funded by the Chelan-Douglas RSN/PIHP following Program Transfer.
 1. Data transactions relative to information maintained in Avatar for individuals who have received or are receiving non-Chelan-Douglas RSN/PIHP funded mental health services are sent to the Chelan-Douglas RSN/PIHP in the event that:
 - (a) A consumer in a private pay episode of care becomes Medicaid eligible and their private pay episode of care is transferred to a Chelan-Douglas RSN/PIHP funded episode of care. Data transactions relative to the private pay episode of care are submitted to the Chelan-Douglas RSN/PIHP, or
 - (b) A consumer in a Chelan-Douglas RSN/PIHP funded episode of care loses Medicaid eligibility and their Chelan-Douglas RSN/PIHP funded episode of care is transferred to a private pay episode of care. Data transactions continue to be submitted to the Chelan-Douglas RSN/PIHP.
 2. In both instances 1(a) and 1 (b) above, the following data transactions are submitted to the Chelan-Douglas RSN/PIHP:
 - (a) WSC Specialized Program
 - (b) GAIN - Short Screener
 - (c) Co-Occurring Matrix
 - (d) Consumer Medicaid Eligibility
 - (e) Avatar PM Movement History
 - (f) Consumer First Contact
 - (g) Consumer Address
 - (h) Consumer Income
 - (i) Consumer Ethnicity
 - (j) Consumer Admission and Exit
 - (k) Consumer Referral
 - (l) Consumer Attending Practitioner
 - (m) Consumer Employment and Education
 - (n) Consumer Crisis Plan
 - (o) Consumer Special Population
 - (p) Complaint and Grievance
 - (q) Consumer Concurrent Review
 3. Encounter data related to services provided within an episode of care not funded by the Chelan-Douglas RSN/PIHP shall not be submitted to the RSN, unless:

- (a) The service code associated with the encounter is configured to always be submitted to the Chelan-Douglas RSN/PIHP on the Electronic Data Interchange (EDI) within the WSRC Service Code Cross Reference option.

III. Privacy

1. The Chelan-Douglas RSN/PIHP shall treat all data associated with a private pay episode of care maintained within the MSO database that has been submitted to the Chelan-Douglas RSN/PIHP following a transfer from a private pay episode of care to a Chelan-Douglas RSN/PIHP funded episode of care in accordance with applicable State and Federal Rules.
2. The Chelan-Douglas RSN/PIHP shall maintain Business Associate Agreements with all providers submitting data to the Chelan-Douglas RSN/PIHP over EDI.