

 <p>SPOKANE COUNTY Regional Support Network Prepaid Inpatient Health Plan</p>	Policy Title: Oaths of Confidentiality		Policy # MIS-24
	Signature: Signature on file	Revised:	
	Christine Barada, Director Community Services, Housing and Community Development	Reviewed: 8/30/07	
	Signature Date: 8/30/07	Signing by authority of Res. No. 2007-0038	

Applies to: Internal External

References

RCW [71.24.035](#), [71.05.560](#), and chapters [71.24](#) and [71.05](#)
RCW. 06-17-114, § 388-865-0275, filed 8/18/06, effective 9/18/06

Scope

SCRSN/PIHP

Policy

The SCRSN will maintain on file a statement signed by regional support network, county or service provider staff having access to the mental health information systems acknowledging that they understand the rules on confidentiality and will follow those rules.

Procedures/Mechanisms

1. The SCRSN will follow HIPAA Privacy and Security guidelines in using the minimum necessary standards for all uses, disclosures, and requests for PHI.
 - 1.1. SCRSN – General Access – Reports, Forms, Miscellaneous Disclosures
 - 1.1.1. As County employees, all RSN staff must abide by Spokane County Policy and Procedure manual 710-Standards of Conduct
 - 1.1.1.1. *All County employees are expected to represent the County in a professional manner that is courteous, efficient and helpful, respecting the confidential nature of the records and information to which they have access.*
 - 1.1.2. All RSN staff will sign departmental confidentiality statement

1.1.2.1. *I hereby affirm and promise that I shall not divulge information concerning any individual client who is receiving services funded by Spokane County Community Services department. As a condition of observing or performing client services, obtaining information from any agency, person or from client records, I shall not reveal, publish or make known in any manner any information which identifies an individual client. I acknowledge and am informed that unauthorized release of confidential information shall subject me to penalty and liability under the laws of the State of Washington.*

1.1.3. Oaths of Confidentiality will be maintained and stored in employee files

1.2. SCRSN – MIS (Raintree) – On line access to Consumer Data

1.2.1. All RSN staff, contractors, sub-contractors must sign an Oath of Confidentiality prior to gaining access to MIS

1.2.1.1. *I agree not to divulge, publish, or otherwise make known to unauthorized persons the information obtained by my access to the SCRSN MIS. I understand that this Oath is valid only if it carries my own signature and the required signature of the Security Officer qualified to grant access to the SCRSN-MIS. I understand that information obtained from the SCRSN-MIS may contain information considered confidential by state and/or federal regulations. I recognize that unauthorized release of confidential information may subject me to criminal and civil liability under the provisions of state and federal law.*

1.2.2 Oaths of Confidentiality received by SCRSN will be maintained and stored by SCRSN IS staff. Original Oaths of Confidentiality must be maintained and stored by the sub-contractor.

1.3. MHD – Intranet Access – On line access to Eligibility Data

1.3.1 Access to MHD Intranet is granted based on guidelines set by SCRSN MHD Intranet policy

1.3.2 All RSN staff, contractors, sub-contractors who access the MHD Intranet must sign the MHD Oath of Confidentiality prior to gaining access.

1.3.2.1. *I agree not to divulge, publish, or otherwise make known to unauthorized persons the information obtained by my access to the MHD Intranet.*
I understand that this Oath is valid only if it carries my own signature and the required signature of the Security Officer qualified to grant access to the MHD Intranet.
I understand that information obtained from the MHD Intranet may contain information considered confidential by state and/or federal regulations. I recognize that unauthorized release of confidential information may subject me to criminal and civil liability under the provisions of state and federal law.

1.3.3. MHD Oaths of Confidentiality will be maintained and stored by SCRSN IS staff with copies faxed to Mental Health Division. Original Oaths of Confidentiality must be maintained and stored by the sub-contractor.

1.4. Sub-contractor incidental access to PHI.

1.4.1 Sub-contractors that have incidental access to PHI are required to sign a Sub-Contractor Access to Protected Health Information, oath of confidentiality statement.

1.4.1.1. *I agree not to divulge, publish, or otherwise make known to unauthorized persons and information viewed or obtained while dealing with SCRSN equipment, data and materials.*
I understand that this Oath is valid only if it carries my own signature or any of my subcontractors.
I understand that information obtained from the SCRSN may contain information considered confidential by state and/or federal regulations. I recognize that unauthorized release of confidential information may subject me to criminal and civil liability under the provisions of state and federal law.

2. The SCRSN will review the SCRSN MIS and MHD Intranet confidentiality statements annually, or as notified by Spokane County Human Resources and/or Information Services, or by provider agency administrative personnel.