|  |  |
| --- | --- |
| **POLICY TITLE:** | Technology & Data Protection Plan - CP35 |
| **APPLIES TO:** | All Clinical Staff at Caregiver Grove Behavioral Health |
| **EFFECTIVE DATE:** | August 1, 2018 |
| **ANNUAL**  **REVIEW DATE:** | January 1 (each calendar year)  Reviewed: August 7, 2024 |
| **PURPOSE:** | To ensure that Caregiver Grove Behavioral Health’s electronic data is protected, and that technology is utilized for quality improvement initiatives, efficiency, data collection, and analysis. |
| **DEFINITION:** | The process of that Caregiver Grove Behavioral Health uses to protect its data and improve service delivery through analysis and data collection. |
| **POLICY** | Caregiver Grove Behavioral Health’s Operations Department will ensure that the Technology, Data & System Plan is followed. Responsibilities may be delegated when necessary. The Operations Department must ensure that federal privacy regulations are followed. Executive staff are responsible for budgetary recommendations.  **Plan Review and Security of Clinical Records:**   * The plan must be reviewed and approved annually by the Operations Department. Any changes will be shared with the Quality Improvement Committee and approved by the Operations and Clinical Services Department. * All personnel must be trained in the technology and system privacy policy and procedures upon hire by the Operations Department and/or direct supervisor. * All hardware and software must be up-to-date, in working condition, and appropriate for the intended task(s). Caregiver Grove Behavioral Health must upgrade computers, laptops, or devices as needed annually. The Operations Department is responsible for ensuring this task. * Caregiver Grove Behavioral Health uses a secure email system. * All electronic correspondence (e-mail, fax) with identifying client information must contain a disclaimer notifying the recipient of the correspondence of the necessary steps to take if they were not the intended recipient. * Caregiver Grove Behavioral Health’s Operations Department must ensure that current virus protections are utilized on all computers, laptops, and devices. * Caregiver Grove Behavioral Health will follow disaster recovery guidelines for data to minimize risk due to system failure, fire, or other disaster. If billing data is housed outside of the EHR, it must be backed up daily, and all other data must be backed up weekly by the Operations Department. The Operations Department will continue to work with its IT staff, for back-up to increase storage capability, efficiency, and data integrity. * Employee access to Caregiver Grove Behavioral Health’s EHR is granted to each user based on the functions, duties, and privileges required by the employee’s specific job role. * Caregiver Grove Behavioral Health will ensure that data, program, system, and network integrity is maintained and/or changed in a specific and authorized manner. User actions are able to be tracked and audited with a chronological record of activity for auditing purposes. * Caregiver Grove Behavioral Health will ensure that client record systems using electronic signatures comply with ORC 3701.75:   "Electronic signature" means any of the following attached to or associated with an electronic record by an individual to authenticate the record:   * A code consisting of a combination of letters, numbers, characters, or symbols that is adopted or executed by an individual as that individual's electronic signature. * A computer-generated signature code created for an individual * An electronic image of an individual's handwritten signature created by using a pen computer.     Caregiver Grove Behavioral Health will continue to build its data systems for more efficient data collection, analysis, tracking, and reporting. Client Satisfaction Survey and discharge data will also be collected. Caregiver Grove Behavioral Health will report data if requested by OhioMHAS in accordance with ORC 5119.61. The data system will be used to collect data on children, youth, and adults and include (but not limited to) the following:   * If treatment plan goals were met or not met * The client’s satisfaction with services * The client population served based on varying characteristics of the population. * The frequency of data collection will include when services began and ended as well as at intervals as determined by the Clinical Services Department. |
| **APPLICABLE STANDARDS:** | OAC 5122-26-08; 5122-26-08.1, 5122-28-04  CARF 1.J |
| **EXCEPTIONS:** |  |
| **APPROVERS:** | John Tooson IV | Chief Executive Officer (CEO)  Arnethia Levey | Vice President, Program Development & Compliance |