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North Sound Behavioral Health Administrative Services Organization, LLC

Section 4200 - Information Systems: North Sound BH-ASO Health Information System

Authorizing Source:

Approved by: Executive Director Date: 01/07/2020

Signature:

POLICY # 4211.00

SUBJECT: NORTH SOUND BEHAVIORAL HEALTH ADMINSTRATIVE SERVICES ORGANIZATION (NORTH SOUND BH-ASO) HEALTH INFORMATION SYSTEM (HIS)

PURPOSE

Provide Health Information Systems to securely collect, maintain and report data at North Sound Behavioral Health Administrative Services Organization (North Sound BH-ASO).

POLICY

North Sound BH-ASO has created and maintains the operation of a HIS. This system is used to collect, and report data as required by North Sound BH-ASO contracts. The data stored in the North Sound BH-ASO HIS is used for fiscal billing and reporting, quality management, utilization management, and program oversight.

North Sound BH-ASO expects all providers to maintain a health information system that complies with Health Care Authority (HCA) Information Security Policy and Standards 6.16 and Office of the Chief Information Officer (OCIO) Security Standard 141.10. North Sound BH-ASO providers are referred to the OCIO Security Standards (<https://ocio.wa.gov>) and recommended Special Publications <https://csrc.nist.gov/publications/sp/>) to achieve and maintain compliance with these standards.

North Sound BH-ASO providers shall notify North Sound BH-ASO of any change to their information system, at the time planning begins for implementation, that will have any effect on the data submitted to or otherwise required to be collected by North Sound BH-ASO. Prior to implementing changes to production systems, providers will conduct testing as noted below.

North Sound BH-ASO providers participate in the North Sound BH-ASO Provider Technical Workgroup and information systems policy groups when requested by North Sound BH-ASO. North Sound BH-ASO providers who perform delegated functions will comply with North Sound BH-ASO policies and procedures regarding quality, accuracy, and data reporting, as well as with HCA and OCIO 141.10 policies and procedures.

Periodically, North Sound BH-ASO may receive requests for information from HCA that may not be readily available in the North Sound BH-ASO HIS and require collection of this information from a provider. Providers shall ensure that requested information is received in a manner that will allow North Sound BH-ASO to make a timely response to these inquiries.

PROCEDURES

North Sound BH-ASO has the following mechanisms in place to verify the health information received from its delegate providers:

North Sound BH-ASO Data Dictionary

The North Sound BH-ASO Data Dictionary can be found on the North Sound BH-ASO website. This set of documents describes the data, format, and content that is to be electronically submitted to North Sound BH-ASO from its providers. North Sound BH-ASO providers will:

1. Provide all applicable data as described in the North Sound BH-ASO Data Dictionary.
2. Participate in North Sound BH-ASO decisions related to North Sound BH-ASO Data Dictionary changes.
3. Implement changes made to the North Sound BH-ASO Data Dictionary in the timeframe required by North Sound BH-ASO.
 - a. In the event short timelines for implementation of changes are required or necessitated by either a court order or agreement resulting from a lawsuit or legislative action, North Sound BH-ASO will:
 - i. provide as much notice as possible of the impending changes
 - ii. provide specifications for the changes as soon as they are available.
 - iii. implement the changes required by the timeline established in the court order, legal agreement, or legislative action.
4. North Sound BH-ASO providers will implement changes to the content of national standard code sets (such as Current Procedural Terminology [CPT] Codes, Healthcare Common Procedural Coding System [HCPCS], Place of Service code sets) per the instructions and implementation schedule or deadline from the issuing organization.

Testing

Prior to the implementation of any change which affects the data submitted to North Sound BH-ASO – regardless of whether as a result of North Sound BH-ASO Data Dictionary changes or Contractor data quality improvement activities – testing must be conducted and successfully completed. Prior to moving changes into production systems, North Sound BH-ASO providers shall submit test batches of the changes to the North Sound BH-ASO Test System. The test batches must be generated from the provider test system and contain a variety of different scenarios related to the changes.

Depending on the testing being done, North Sound BH-ASO will provide a standard batch report and/or detailed analysis of the test batch identifying issues, if any, to the provider. Once North Sound BH-ASO approves testing of batches, the contractor will be allowed to move changes into production systems. North Sound BH-ASO approval will be given after a test batch produces no errors or other mutually agreed upon amount of specific errors.

Data is transferred, parsed and verified using standard Electronic Data Interchange (EDI) data transaction sets. North Sound BH-ASO provides Secure File Transfer Protocol (SFTP) servers for manual and automated data transfer and verification. The automated processes are used to verify the accuracy of the data transferred before that data is imported into the database system to maintain the integrity of submitted data and to prevent a failure of the system.

All collected data is made available to HCA and providers upon request and on demand, to the extent permitted by the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule (45 Code of Federal Regulation [CFR] Part 160, Subparts A and E of Part 164, and Revised Code of Washington [RCW] 70.02.005). Reporting Servers have been set up specifically for this purpose. Custom reports can be generated and provided, as needed, and on an ad-hoc basis.

North Sound BH-ASO provider data will be transferred to North Sound BH-ASO securely using the following:

1. SFTP Transfer

Provider logs into the North Sound BH-ASO SFTP server using a unique, hardened pre-assigned user account using an SFTP Client (or automated SFTP process). The Providers public IP address is white listed for additional security.

- a. Provider uploads the data files to the North Sound BH-ASO SFTP server.
- b. A daily automated process parses the uploaded file to verify the data and to prevent improperly formatted data that could cause a failure of the system.
- c. Other daily scripts and reports are run to find inconsistencies.
- d. North Sound BH-ASO staff work daily with providers and provides them with the Data Extract Report to show them error counts that need to be addressed.

2. Email Transfer

Occasionally, a secure email is sent in lieu of SFTP using either the Office 365 secure email service, or the Cisco Registered Envelope Service (RES) to verify end to end secure transfer. A North Sound BH-ASO Managed File Transfer (MFT) secure file sharing server is provided to transfer files too large to email.

Timeliness

At a minimum, North Sound BH-ASO providers shall transmit data to North Sound BH-ASO once per week, except as noted below.

1. Emergency Services

The provision of any emergency service shall be collected by the provider's health information system and submitted to the North Sound BH-ASO within twenty-four hours from the completion of that service.

2. Routine Data Submission

Required data must be reported by the 5th calendar day after the close of each calendar month in which the event occurred. For example:

- a. An encounter that occurred in January shall be submitted by the 5th of February.
- b. A change in a client's address that occurred in March must be reported by the 5th of April.

3. Error Resolution

After North Sound BH-ASO processes provider submitted batches, a batch report will be generated that will show each record submitted per the North Sound BH-ASO Data Dictionary, if they successfully passed validation rules, and any errors that may be applicable to the record(s). Validation rules applied to submitted records can be found in the North Sound BH-ASO Data Dictionary. This batch report will be made available in the provider's 'Outbound' directory on the North Sound BH-ASO SFTP site. Certain errors may appear in the batch reports that are not able to be corrected. Corrections to non-correctable errors are not expected to be acted upon and will not show up in other error-related reports. Some of these errors include:

- a. Requesting to delete a record that does not exist in the North Sound BH-ASO HIS.
- b. Submitting a service that is over one year old.

North Sound BH-ASO providers will make corrections in their data system for any record that results in an error and submit the corrected data to North Sound BH-ASO in a new batch within 10 calendar days of the batch report being generated. The provider shall maintain the originally submitted record key when submitting corrections.

Outstanding Errors

North Sound BH-ASO Providers will ensure enough resources are made available to Information System and/or Data Integrity staff to correct any errors that are present in the received data. File replies will be generated

for each batch of data submitted and will be placed in the provider's 'Outbound' directory on the North Sound BH-ASO SFTP site. Errors on the reply files that have been outstanding for more than 10 calendar days will be an indication, in part, of non-compliance with error resolution timelines.

Additional Data Cleanup Reports

North Sound BH-ASO will routinely generate additional data cleanup reports that will be provided to our providers. North Sound BH-ASO providers shall go through said reports within 10 calendar days and do one of the following:

1. Make corrections in their information system and submit corrected data to North Sound BH-ASO; or
2. Notify North Sound North Sound BH-ASO at CIS@nsbhaso.org that the record(s) on the cleanup report is/are correct.

Business Continuity and Disaster Recovery

North Sound BH-ASO maintains a Business Continuity and Disaster Recovery Plan (BCDRP) that ensures timely reinstatement of the HIS following total loss of the primary system or a substantial loss of functionality. The BCDRP is reviewed annually, revised as needed, and stored securely offsite.

The North Sound BCDRP addresses the following:

1. A mission or scope statement;
2. An appointed Information Services Disaster Recovery Staff;
3. Provisions for backup of key personnel, identified emergency procedures, and visibly listed emergency telephone numbers;
4. Procedures for allowing effective communication, applications inventory and business recovery priority, and hardware and software vendor list;
5. Confirmation of updated system and operations documentation;
6. Process for frequent backup of systems and data;
7. Off-site storage of system and data backups;
8. Ability to recover data and systems from backup files;
9. Designated recovery options which may include use of an alternate site
 - a. A current hot or cold site is not currently used; if a disaster occurs rendering the current business site unusable, an alternate physical site (or cloud hosted "virtual" site) must be obtained before services can be fully brought back online.
10. Evidence that disaster recovery tests or drills have been performed.

REFERENCES

North Sound BH-ASO BCDR Plan

ATTACHMENTS

None