

**SWMBH Operating Policy 10.17**

<b>SUBJECT</b> Program Integrity – Compliance Social Security Number Privacy Policy	<b>ACCOUNTABILITY</b> Compliance	Effective Date: 8/6/2015	Pages: 2
<b>REQUIRED BY</b> BBA Section _____ PIHP Contract Section _____ NCQA/URAC Standard _____ SA SARF _____ Other MI SSN Privay Act		Last Reviewed Date: 11/21/16	Past Reviewed Dates: 9/1/15
<b>LINE OF BUSINESS</b> <input type="checkbox"/> Specialty Waiver (B/C) <input type="checkbox"/> I Waiver <input type="checkbox"/> ABW Waiver <input type="checkbox"/> SUD Medicaid <input type="checkbox"/> SUD CA Block Grant <input type="checkbox"/> MME <input type="checkbox"/> Other: _____	<b>APPLICATION</b> <input checked="" type="checkbox"/> SWMBH Staff and Ops <input type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH / DD providers <input type="checkbox"/> DD providers <input type="checkbox"/> MME providers <input type="checkbox"/> Other: _____	Last Revised Date: 11/21/16	Past Revised Dates: 9/1/15
Approved: <u>Mila C. Todd</u> By: _____ Date: <u>11/28/2016</u>		Required Reviewer Chief Compliance & Privacy Officer	

**I. Purpose**

Southwest Michigan Behavioral Health (SWMBH) is committed to protecting the privacy and security of any social security numbers obtained and maintained for the purposes of compliance with Prepaid Inpatient Health Plan (PIHP) contractual obligations and Act 454 of 2004 the Social Security Number Privacy Act.

**II. Policy**

Social security numbers are obtained and maintained by SWMBH consistent with the requirements of the Michigan Department of Health and Human Services (MDHHS) PIHP contract. Social Security numbers that are obtained from employees, providers, contractors, or others are confidential information. Such numbers will be obtained, retained, used and disclosed only for legitimate business purposes and in accordance with the Michigan Social Security Number Privacy Act. SWMBH will cooperate with appropriate law enforcement or administrative agencies in the apprehension and prosecution of any individual who obtains, uses or discloses Social Security Numbers for unlawful reasons.

**III. Standards and Guidelines**

- A. SWMBH will implement security systems that limit access to social security numbers to those who require access for work-role related purposes.
- B. SWMBH staff are prohibited from disclosing any social security numbers collected and maintained to anyone outside of SWMBH except for purposes consistent with standard business practices.
- C. SWMBH staff are prohibited from disclosing any social security numbers collected and maintained to other employees within SWMBH who do not have a work-role related need to know the information.
- D. Any hard copy documents containing social security numbers will be disposed of through a process of shredding that renders the document and information to be unreadable and unusable to unauthorized users. Electronic files containing social security numbers will be disposed of consistent with SWMBH policy requirements in order to render the information unreadable and unusable to unauthorized users.

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- E. Social Security numbers are entered into a password protected, encrypted flash drive. The flash drive is stored in a keyed lock box, to which only designated members of SWMBH Compliance staff hold a key. The keyed lock box is stored in the SWMBH Finance safe, which Compliance staff cannot independently access. Access to the Finance safe requires a member of the SWMBH Finance staff to open the safe. A log is kept with the date/time the flash drive is taken out of the safe or put back into the safe. The log requires signatures by both the Finance staff that opened the safe and the Compliance staff that took the flash drive. The Password for the flash drive is changed every 90 days.
- F. Any SWMBH staff who violate this policy will be subject to discipline consistent with the discipline standards set forth in the related compliance policy up to and including termination.

### **IV. Definitions**

None

### **V. References**

Act 454 of 20014 MI Social Security Number Privacy Act

### **VI. Attachments**

None