

Records Processing Policy

1. Introduction

- a. Clark County has adopted this Records Processing Policy to comply with our duties under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), the Department Health and Human Services (“DHHS”) security and privacy regulations, the Joint Commission on Accreditation of Healthcare Organizations (“JCAHO”) accreditation standards, as well as our duty to protect the confidentiality and integrity of confidential medical information as required by law, professional ethics, and accreditation requirements.
- b. All personnel of Clark County must comply with this policy. Familiarity with this policy and demonstrated competence in the requirements of the policy are an important part of every employee’s responsibilities.

2. Policy

- a. Clark County is committed to collect only the minimum information necessary to perform its medical and business functions in accordance with the “minimum necessary” standard of the DHHS privacy regulations.
- b. Clark County is also committed to processing information in such a manner as to result in the highest possible standards of data integrity, availability, accuracy, and confidentiality.
- c. All Clark County personnel must collect, record, maintain, use, and transmit data in such a manner as to maintain the highest possible standards.

3. Protective Measures

- a. In order for Clark County to accomplish such aforementioned policies, the following protective measures may be carried out:
 - i. Complete a risk analysis of medical risks and computer-related risks inherent in inaccurate or unavailable health information and select and implement cost-effective security measures to guard against such risks.
 - ii. Develop standards of what constitutes the minimum necessary information to collect, use, or disclose for medical purposes and develop criteria for routine uses and disclosures.
 - iii. Ensure medical professionals edit entries in the medical record for accuracy and completeness.
 - iv. Ensure that all entries in medical records are properly authenticated.
 - v. Develop standards of what constitutes the minimum necessary information to collect from patients during the admissions/intake process.
 - vi. Train all personnel on proper collection and recording of information from patients and others.
 - vii. Implement quality control checks on the entry/recording of data, data maintenance, data transmission, and data disclosure, including checking for errors and implementing remedial measures upon detection of errors.

- viii. Ensure proper long-term storage of medical records in accordance with Clark County's Retention Plan.
- ix. Perform appropriate audits of the health information operations, data, use, and disclosure in accordance with Clark County's Internal Audit Policy.
- x. Implement appropriate integrity checks to detect unauthorized use or modification of the system, applications, data, and networks.
- xi. Ensure data availability in accordance with Clark County's Data Backup Plan and Disaster Plan.
- xii. Ensure proper long-term storage of data in accordance with Clark County's Retention Plan.
- xiii. Implement programs to ensure reliability, such as programs that check for logical errors, provide positive identification, and detect circuit breakage and other types of equipment malfunction. Such programs must identify all locations where an error or potential error exists and make all of them available for correction as appropriate.
- xiv. Respond to reports of problems with data integrity, accuracy, and availability to ensure expeditious correction of such problems.
- xv. Analyze problems with data integrity, accuracy, and availability and take appropriate remedial measures against reoccurrence.