



City of
Corpus
Christi

City Policies

SUBJECT: HIPAA ELECTRONIC DATA SECURITY
(Health Insurance Portability & Accountability Act)

HR 30.0

APPROVED: 
George K. Noe, City Manager

EFFECTIVE: 04/20/05

DATE: 4/20/05

I. PURPOSE:

The purpose of this policy is to communicate the City's requirements with respect to safeguarding electronic protected health information.

II. SCOPE

This policy applies to all City employees.

III. DEFINITIONS

Protected Health Information (PHI) – an individual's personal health information, relating to their past, present, or future physical or mental health or condition, provision of health care or payment for provision of health care, which is maintained by the Group Health Plan.

Electronic Protected Health Information (ePHI) – PHI that is transmitted by or maintained in electronic media such as internet, leased and dial-up lines, computer networks, computer hard drives, magnetic tape, disks, CDs and digital memory cards.

IV. POLICY

The City of Corpus Christi prohibits misuse of health information which may be provided in electronic form to the City by any of its health care plan providers.

The Health Benefits Manager serves as the HIPAA Security Officer and shall appoint an Assistant HIPAA Security Officer. ePHI may be accessed and used only by employees who have been authorized to do so by the HIPAA Security Officer.

Employees authorized to access ePHI under this policy and employees responsible for the City's computer network administration and related network data storage system will receive training on the HIPAA Electronic Data Security policy, procedures and rules.

The City of Corpus Christi, through a risk analysis, identified the amount and type of ePHI received from the various health care plan providers and evaluated the repositories for such information. A review of these areas will be conducted on an annual basis.

The following actions are violations of this policy. (Note that this list is not all inclusive.)

- Accessing ePHI that you are not authorized to access
- Sharing your computer access codes, or using another person's access codes to gain access to ePHI.
- Leaving your computer unattended while logged in to a document containing ePHI
- Sharing or discussing ePHI with an unauthorized person, without authorization
- Changing ePHI, without authorization
- Discussing ePHI in a public area or in an area where the public could overhear the conversation
- Unauthorized use or disclosure of ePHI
- Obtaining ePHI under false pretenses
- Using and/or disclosing ePHI for commercial advantage, personal gain or malicious harm.

All workforce members shall report possible violations of this policy to the HIPAA Security Officer. The City will appropriately discipline staff members for any violation of this policy, will investigate and mitigate HIPAA security violations and incidents in a timely manner, and will not intimidate or retaliate against any staff member or individual that reports a HIPAA security violation or incident.

V. CONSEQUENCES FOR VIOLATION OF THIS POLICY

Failure to comply with this policy will result in disciplinary action up to and including termination. The type of discipline applied shall vary depending on the severity of the violation, whether the violation was intentional or unintentional, whether the violation indicates a pattern or practice of improper access, use or disclosure of electronic protected health information and similar factors.

Workforce members should be aware that violations of a severe nature may result in notification to law enforcement officials.

VI. QUESTIONS REGARDING THIS POLICY

Questions regarding this Policy shall be directed to the Director of Human Resources, or designee, who may be contacted at 361/826-3315.

Acknowledgment Form

**HR 30.0 HIPAA Electronic Data Security Policy
City of Corpus Christi**

I have received a copy of the City of Corpus Christi's HR 30.0 Health Insurance Portability and Accountability Act Electronic Data Security. I understand that compliance with this Policy is a condition of employment. I understand that misuse of protected health information will not be tolerated.

I agree to comply with this Policy. If an investigation of allegations conducted by the City of Corpus Christi determines that an employee has misused protected health information in violation of this policy, I understand that disciplinary action up to and including termination will be taken.

I further understand that retaliation, in any form, against me for reporting an incident in good faith under this Policy, or for assisting in the investigation of such an incident, is prohibited. I understand that I should immediately report any incident of retaliation in writing to the Director of Human Resources, or designee.

Employee's Signature

Date

Employee's Name Printed

Employee ID Number

Department Name

Organization Number

Please return to the Human Resources Department, Records Section.