

## BHS Policies and Procedures



City and County of San Francisco  
Department of Public Health  
San Francisco Health Network  
BEHAVIORAL HEALTH SERVICES

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### POLICY/PROCEDURE REGARDING: **Behavioral Health Services EHR Access Control Policy**

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Director of Behavioral Health Services

Effective Date: May 4, 2021

Manual Number: 6.00-06

References: Department of Health  
Care Services (DHCS) MHSUDS  
Information Notice (MHSUDS IN)  
# 18-019, Title 42 of the Code of  
Federal Regulations, Part 438.214

### **Technical Revision. Replaces Policy 6.00-06 dated January 25, 2011**

**Purpose:** To establish policies and guidelines related to requesting, maintaining, and closing Behavioral Health Services (BHS) Electronic Health Record (EHR) User Accounts in accordance with San Francisco Department of Public Health Access Control Policy and in conjunction with the BHS Electronic Record Security and Retention Policy (6.00-03) in order to maintaining security of electronic Protected Health Information (PHI).

**Scope:** This policy applies to any individuals who utilize the DPH IT networks, devices, and software including the Behavioral Health Services (BHS) Electronic Health Record (EHR).

**Policy:** BHS is committed to guard against unauthorized access to Protected Health Information (PHI). Access is granted based on the principles of “need to know” and minimum necessary.

### **Procedure:**

- I. Access to the BHS EHR is granted based on clinical and business requirements.
- II. Each user is identified by a unique Staff ID, User Account, and Password.
  - a. Users agree not to share accounts
  - b. Users must not share passwords
- III. Applicants must complete the credentialing process in accordance with the Department of Health Care Services (DHCS) MHSUDS Information Notice (MHSUDS IN) # 18-019 including the following:
  - a. Obtaining an NPI number from NPPES
  - b. Submitting the Credentialing Application
  - c. Completing the DPH User Agreement for Confidentiality, Data Security, and Electronic Signature
- IV. Account creation and management are the responsibility of Ambulatory Applications Accounts
  - a. Applicants must submit an Account Request Form including
    - i. Program information
    - ii. User Role(s)
    - iii. Supervisor’s signature to indicate authorization/approval

- b. Permissions and level of access are based on “need to know,” job duties and responsibilities.
  - c. Training must be commensurate with the level of access.
- V. Changes in employment must be reported via:
  - a. Updating NPPES
  - b. Submitting an updated Credentialing Application
  - c. Updating the Account Request Form
- VI. Termination of user access may be imposed for the any of the following:
  - a. 90 days of inactivity on the user account
  - b. Separation from employment
  - c. Revocation, suspension, or expiration of license
  - d. Denial of credentialing or re-credentialing
  - e. Unauthorized access including:
    - i. Sharing log-in information or password
    - ii. Disclosing of Protected Health Information (PHI) without authorization
    - iii. Inappropriately accessing PHI
- VII. Vendors, consultants, and other business associates: Access must be time and/or project specific.
  - a. Access requires approval of the Ambulatory Care Applications Manager or designee.
  - b. Access is disabled at the end of the specific time frame or work plan.
  - c. Use is subject to tracking, auditing, and reporting.

**Contact Person:**

Ambulatory Care Applications Manager, 415 255-3566

**Distribution:**

BHS Policies and Procedures are distributed by the Behavioral Health Services Compliance Office

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