1. PURPOSE

The purpose of this policy is to establish the standards and guidelines by which the Department on Disability Services ("DDS"), Developmental Disability Administration ("DDA") and its providers will maintain the confidentiality of data entered in DDA’s information system, MCIS.

2. APPLICABILITY

This policy applies to all DDS providers and vendors that provide services and supports for people with disabilities as part of the DDA service delivery system, funded by DDS or the Department of Health Care Finance ("DHCF").

3. AUTHORITY

The authority for this policy is established in DDS as set forth in D.C. Law 16-264, the “Department on Disability Services Establishment Act of 2006,” effective March 14, 2007 (D.C. Official Code § 7-761.01 et seq.).

4. POLICY

It is the policy of DDS to respect the privacy of the people the Agency supports and to comply with D.C. Official Code § 7-1305.12 (2008 Repl.) requirements on the confidentiality of people’s records and the Health Insurance Portability and Accountability Act of 1996’s (“HIPAA”) Privacy Rules. To support compliance and protect confidentiality, it is DDS’s policy that MCIS account passwords may not be shared; and that passwords must be reset every thirty (30) days.
It is DDA's policy to require continuous and timely maintenance of accurate and relevant data regarding the people DDA supports and the providers who participate in the DDA service delivery system.

5. RESPONSIBILITY

The responsibility for this policy is vested in the Director, Department on Disability Services. Implementation of this policy is the responsibility of the Deputy Director, Developmental Disabilities Administration.

6. STANDARDS

The following are the standards by which DDS will evaluate compliance with this policy:

A. Providers shall maintain a continuous quality assurance and improvement system that ensures that provider employees and contractors whose job duties include entering data in MCIS enter all required data accurately, timely, and with sufficient detail to be useful.

B. Providers shall train staff, employees, contractors, consultants and interns who have access to MCIS on the HIPAA requirements on confidentiality of protected health information; standards for maintaining the privacy of people's records; and how to use and maintain MCIS.

C. MCIS passwords shall not be shared.

D. MCIS passwords must be reset every thirty (30) days.

E. The Executive Director of each DDA service provider, or his or her designee, shall notify the Information and Data Management Division of DDS in writing of any new staff in their organization in need of access to MCIS and request the extent and type of access they should be granted using the MCIS Access Request Form.

F. The Executive Director of each DDA service provider, or his or her designee, shall notify the Information and Data Management Division of DDS in writing of the need to add, exclude or change the MCIS access for any staff within their organization, within one (1) business day of the need for a change.

G. DDS may sanction providers who do not comply with the requirements of this policy and its related procedure.

Laura L. Nuss, Director

9/20/2013

Approval Date