

SHIPM – Update Log

| Section | Page | Change |
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| Cover Letter | n/a | Updated letter for currency. |
| Entire Document | n/a | Updated the header box on all policies to remove the checkbox for Attachments for accessibility. Attachments indicates “Yes” or “No”. |
| 2.1.0 – Authorizations 2.2.0 – Disclosures (all policies) 5.1.1 – Accounting of Disclosures 5.2.1 – Patient’s Right to Amend Medical Records 5.4.1 Patient’s Right to Access Health Information | various | Updated II. Policy to add a statement referring the reader to Specially Protected Information policies. Updated IV. Reference to add SHIPM Chapter 2 – Specially Protected Information |
| 2.2.4 – Health Oversight | 30-32 | Removed CA Health and Safety Code § 1797.122 citation (not applicable for public health) from: <ul style="list-style-type: none"> • II. Policy • III.C • IV. References |
| 2.2.16 – Victims of Abuse, Neglect, or Domestic Violence | 70-71 | SB398 – Protection and advocacy agency. (Chapter 548, October 7, 2019) – updated III.A.4 to add reference to SHIPM Chapter 2 - Developmental Services Records policy, note to consult legal counsel and CA Welfare and Institutions citation. Updated III.A.4 to correct CA Civil Code citation. Updated IV. References with new and corrected citations. |
| 2.3.3 – Mental Health Records | 84, 86 | SB398 – Protection and advocacy agency. (Chapter 548, October 7, 2019) – updated: <ul style="list-style-type: none"> • III.B.6 to add reference to SHIPM Chapter 2 - Developmental Services Records policy and CA Welfare and Institutions citation. • IV. References with new citation. Updated III.B.9 to replace Mental Health Professional term with Qualified Professional. |
| 2.4.1 – Breach and Breach Notification | 108 | AB1130 – Personal information: data breaches. (Chapter 750, October 11, 2019) – updated III.G items to reflect breach notification updates |
| 2.9.1 – Requirements for Telehealth | 122-123 | Updated policy header and IV. Attachments to reflect new attachment. |

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| 3.1.4 – Security Management Process | 141, 144-145 | <p>Updated III.A.4 to reflect California Department of Technology (CDT) updates to SAM 5315 and SIMM 5315-A.</p> <p>Added III.C.8 to reflect CDT PS005_2019 (November 2019) – Privacy Threshold Assessment and Privacy Impact Assessment. Also updated IV. References to include SAM and SIMM citations.</p> <p>Updated policy header and IV. Attachments to reflect removal of the attachment (Risk Analysis Assessment Checklist).</p> |
| 3.2.3 – Facility Access Controls | 158 | Removed “facilities-related” from III.A.3 to provide clarity regarding access to software programs. |
| 3.2.4 – Workstation Use and Security | 163-164 | <p>Updated III.B.3.a to clarify the difference between termination of session and logoff.</p> <p>Updated III.B.3.d to reflect California Department of Technology (CDT) updates to SIMM 5315-A.</p> |
| 3.3.2 – Encryption | 170 | Updated II. Policy and III.B to provide better clarity regarding encryption requirements. |
| 3.3.5 – Access Control | 176 | Updated III.A.1.c to clarify the difference between termination of session and logoff. |
| 3.4.1 – Documentation | 178, 182 | Updated policy header and IV. Attachments to reflect new attachment. |
| 4.1.1 – Policies and Procedures | 186 | Updated IV. Attachments with correct attachment name |
| 4.1.4 – Staffing: Privacy Official, Security Official | 192-194 | <p>Updated II. Policy to add the term “duty statements”.</p> <p>Updated III.A.1 and 3 to reflect AHIMA updates to sample job descriptions for Privacy and Security Officer.</p> |
| 4.1.5 – Trading Partner Agreements | 198 | Updated V. Related Policies to reflect updated policy name for 4.5.1 |
| 4.2.1 – Consequences of Non-Compliance | 200, 202 | Updated III. Implementation and IV. References to correct citation |
| 4.3.1 – Transactions and Code Sets | 205 | <p>Final Rule - Administrative Simplification: Rescinding the Adoption of the Standard Unique Health Plan Identifier and other Entity Identifier (RIN 0938-AT42: CMS-0054-F) – updated:</p> <ul style="list-style-type: none"> • III.A.2 to update policy name for 4.5.1 • III.A.2(b) to remove reference to health plan identifiers |

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| 4.4.1 – Business Associate Agreement | 208 | Added items (III.F and G) that were removed from 4.4.2 – Oversight of Business Associates (BA) that are Business Associate Agreement related Added III.H regarding documentation requirements of the BA. |
| 4.4.2 – Oversight of Business Associates | 212 | Removed III.B.1 and 2 from this policy and added to 4.4.1 Business Associate Agreement |
| 4.5.1 – Provider, Employers Identifiers | 215 | Final Rule - Administrative Simplification: Rescinding the Adoption of the Standard Unique Health Plan Identifier and other Entity Identifier (RIN 0938-AT42: CMS-0054-F) – updated the following to reflect Final Rule: <ul style="list-style-type: none"> • Policy title (removed Health Care Plan) • I. Purpose (removed reference to health care plans) • III.A.1 (removed health care plan/HPID) |
| 5.2.1 – Patient’s (Individual’s) Right to Amend Medical Records | 234-236 | Updated III.A.5 to correct citations. Updated III.B, C and D to correct citations. Updated IV. References to reflect citation corrections. |
| 5.4.1 – Patient’s (Individual’s) Right to Access Health Information | 240-247 | Re-wrote policy for clarity. In addition, the following updates were made: <ul style="list-style-type: none"> • AB175 – Foster care: rights. (Chapter 416, October 2, 2019) – added III.D.2 regarding foster care right to review/receive copies of their medical records at no cost. • Updated III.E.1.c to clarify denial of access for Department of Health Care Services, Department of Developmental Services and Department of State Hospitals. |
| SHIPM Definitions | 258, 267, 269, 271 | <ul style="list-style-type: none"> • Updated citations for Disability Rights California to reflect SB398 – Protection and advocacy agency. (Chapter 548, October 7, 2019) • Removed Mental Health Professional definition • Updated citations for Mental Health Records definition • Updated Physical Safeguards for clarity • Updated Psychotherapy Notes to reflect terminology changes (from mental health professional to qualified professional) • Added Qualified Professional definition |
| Attachment – 2.9.1 – Telehealth Checklist | All | New checklist/attachment |
| Attachment – 3.1.4 - Risk Analysis Assessment Checklist | n/a | Removed attachment |

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| Attachment – 3.4.1 & 4.1.1 – SHIPM Required Policies and Procedures | All | <p>Updated title of attachment from “HIPAA Required...” to “SHIPM Required...”</p> <p>Updated to reflect SHIPM changes to policy titles and/or referenced items.</p> |
| Attachment – 4.4.1 – HIPAA Business Associate Agreement Template | 2 | Recitals – Standard Risk section - Added definition for Unsecured Protected Health Information (item D.) |