




Section: Compliance	Policy Name: Social Security Number Privacy	Policy Number: 10.17
Owner: Chief Compliance Officer	Reviewed By: Mila C. Todd	Total Pages: 3
Required By: <input type="checkbox"/> BBA <input type="checkbox"/> MDHHS <input type="checkbox"/> NCQA <input checked="" type="checkbox"/> Other (please specify): <u>MCL 445.81 et seq</u>	Final Approval By:  Mila Todd (Jul 31, 2024 15:18 EDT)	Date Approved: Jul 31, 2024
Application: <input checked="" type="checkbox"/> SWMBH Staff/Ops <input checked="" type="checkbox"/> Participant CMHSPs <input type="checkbox"/> SUD Providers <input type="checkbox"/> MH/IDD Providers <input type="checkbox"/> Other (please specify): <hr/>	Line of Business: <input checked="" type="checkbox"/> Medicaid <input type="checkbox"/> Other (please specify): <input checked="" type="checkbox"/> Healthy Michigan _____ <input checked="" type="checkbox"/> SUD Block Grant <input checked="" type="checkbox"/> SUD Medicaid	Effective Date: 08/06/2015

Policy: Social security numbers are obtained and maintained by Southwest Michigan Behavioral Health (SWMBH) consistent with the Michigan Department of Health Human Services (MDHHS) Prepaid Inpatient Health Plan (PIHP) contract requirements to obtain and maintain information about ownership and control interests, business transactions, and criminal convictions as specified in 42 CFR §455.104-106. Social Security numbers that are obtained from employees, providers, contractors, or others are confidential information. Such numbers will be obtained, retained, used and disclosed only for legitimate business purposes and in accordance with the Michigan Social Security Number Privacy Act. SWMBH will cooperate with appropriate law enforcement or administrative agencies in the apprehension and prosecution of any individual who obtains, uses or discloses Social Security Numbers for unlawful reasons.

Purpose: The purpose of this policy is to outline SWMBH’s commitment to protecting the privacy and security of any social security numbers obtained and maintained for the purposes of compliance with PIHP contractual obligations and Act 454 of 2004 the Social Security Number Privacy Act.

Scope: SWMBH Program Integrity & Compliance Department

Responsibilities:

The SWMBH Program Integrity & Compliance Department has a responsibility to protect the privacy and security of Social Security Numbers obtained through the Ownership & Control Disclosure process, in accordance with this policy.



Definitions: None.

Standards and Guidelines:

- A. SWMBH will implement security systems that limit access to social security numbers to those who require access for work-role related purposes.
- B. SWMBH staff are prohibited from disclosing any social security numbers collected and maintained to anyone outside of SWMBH except for purposes consistent with standard business practices.
- C. SWMBH staff are prohibited from disclosing any social security numbers collected and maintained to other employees within SWMBH who do not have a work-role related need to know the information.
- D. Any hard copy documents containing social security numbers will be disposed of through a process of shredding that renders the document and information to be unreadable and unusable to unauthorized users. Electronic files containing social security numbers will be disposed of consistent with SWMBH policy requirements in order to render the information unreadable and unusable to unauthorized users.
- E. Ownership & Control Disclosure Forms Collection & Storage
 - 1. Collection. Required information will be collected in accordance with SWMBH Operating Policy 10.13 and Procedure 10.13.01.
 - 2. Social Security numbers that are collected as part of compliance with the Ownership & Control Disclosure collection process prescribed by 42 CFR §455.104-106 shall be stored in the following manner:
 - a. Ownership & Control Disclosure forms, including SSNs on the forms, are saved in a private folder on the corporate shared drive upon receipt.
 - b. Access to the designated private folder shall be restricted to the Chief Compliance Officer, SWMBH Program Integrity & Compliance team members, as authorized by the Chief Compliance Officer, and the Chief Information Officer and system administrators.
 - c. The access restrictions outlined in section E(2)(b) above shall be accomplished via **HOW**
 - 3. Hard copy Forms that contain SSNs shall be disposed of consistent with (D) above promptly after the information is stored on the private corporate shared drive.
- F. Any SWMBH staff who violate this policy will be subject to discipline consistent with the discipline standards set forth in the related compliance policy up to and including termination.

References:

Act 454 of 20014 MI Social Security Number Privacy Act
42 CFR §455.104-106
SWMBH Operating Policy and Procedure 10.13/10.13.01

Attachments: None

Revision History

10.17 Social Security Number Privacy

Final Audit Report

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