

HIPAA-36: Emergency Access Policy

Effective Date:	12-01-2015	Last Revised:	7-17-2017
-----------------	------------	---------------	-----------

Scope of Policy

This policy governs Access to Protected Health Information during emergencies for **TCS**. All personnel of **TCS** must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibilities of every member of the workforce.

Assumptions

- TCS** must comply with HIPAA and the HIPAA implementing regulations pertaining to emergency access procedures, in accordance with the requirements at § 164.104, § 164.306, and § 164.312(a)(1).
- The establishment of emergency access procedures further strengthens the protections we offer to individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA).

Policy Statement

- It is the Policy of **TCS** to establish and implement emergency access procedures, in full compliance with all the requirements of HIPAA.
- These emergency access procedures apply to access to individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA).
- Responsibility for the development and implementation of our emergency access procedures shall reside with Executive Director, who shall ensure that these procedures are maintained, updated as necessary, and implemented fully throughout our organization.
- Specific procedures shall be developed to ensure that authorized workforce members can access individually identifiable health information, including Protected Health Information ("PHI", as defined by HIPAA) during emergencies.
- These Emergency Access Procedures shall be developed and implemented in combination with our emergency preparedness and response plans.
- It is the Policy of **TCS** to fully document our emergency access procedures development and implementation, in accordance with our Documentation Policy and the requirements of HIPAA.

Procedures

- Contact IT firm (NetGain Technologies) to request activation of the Disaster Recovery server at the remote DR site and initiate the associated failover process. This procedure can require up to a one hour to complete for all employees.
- Contact all staff to advise them that Emergency Access procedures have been activated with instructions on access protocol.
- All administrative office staff report to disaster recovery site at the beginning of the next work day.
- Clinical staff carry on seamlessly.