



# North Sound Behavioral Health Organization, LLC

301 Valley Mall Way, Suite 110, Mount Vernon, WA 98273  
<http://northsoundbho.org> • 360.416.7013 • 800.684.3555 • F 360.416.7017

North Sound BHO Contract Memorandum 2018-007

Date: March 26, 2018

To: Al Jordan, Affiliated Health (Skagit)  
Valentina Hayward, Affiliated Health (Skagit)  
Ann Moore, Seattle Children's Hospital  
Bill Sinclair, Swedish Hospital  
Danielle Kiser, Peace Health Hospital  
Jennifer Gracie, Peace Health Hospital  
Holly Nielsen, Skagit Valley Hospital  
Jamie Roberson, Smokey Point Behavioral Hospital  
John Beall, Smokey Point Behavioral Hospital  
Kathy Brewer, Seattle Children's Hospital  
Khalid Ahmed, Fairfax Hospital  
Kimberly Hale, Peace Health Hospital  
Lejla Marusic, Smokey Point Behavioral Hospital  
Kim Mercier, Smokey Point Behavioral Hospital  
Lori Lubbers, Skagit Valley Hospital  
Marci Bloomquist, Volunteers of America  
Levi Van Dyke, Volunteers of America  
Mattias Houck, Swedish Hospital  
Pat Morris, Volunteers of America  
Paula Hornberger, Fairfax Hospital  
Richard R. Geiger, Fairfax Hospital  
Ruth Lopez-Fuentes, Multicare  
Theresa Schlauch, Skagit Valley Hospital  
Julie Zarn, Providence Hospital  
Sara King, Volunteers of America  
Stacey Tran, Fairfax Hospital

From: Matt Rudow, Privacy Officer

Subject: Unsolicited Treatment Records via Facsimile

Greetings Regional Inpatient Psychiatric Utilization Management Stakeholders and Psychiatric Utilization Management (UM) Workgroup:

Please find attached the letter dated 3/26/18 regarding "unsolicited treatment record documentation that includes protected health information (PHI)".

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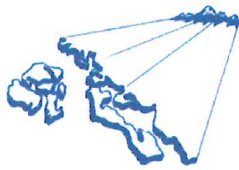
The attached letter serves as notification of a change in practice by North Sound Behavioral Health Organization (North Sound BHO) and reminder to inpatient providers regarding risk for exposure to potential breach of privacy.

The attachments will be effective April 1, 2018.

The NM has letter attachment included below for your convenience.

Please ensure all appropriate staff is notified of these changes.

Contract File



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March 26, 2018

TO: North Sound BHO Inpatient Providers

The intent of this letter is to serve as notification of a change in practice by the North Sound BHO and reminder to inpatient providers regarding a risk for exposure to potential breach of privacy by the submission of faxes to North Sound BHO containing unsolicited treatment record documentation that includes protected health information (PHI).

North Sound BHO has noted a significant trend in receipt of sizeable faxes of PHI from inpatient facilities together with requests for distinct types of inpatient service authorization. The authorization process for North Sound BHO is a function delegated to Volunteers of America (VOA) under [Policy 1571.00](#), Inpatient Psychiatric Authorization. All inpatient authorization requests fall within VOA's auspices for determination. Should VOA require clarification to act, they will consult with North Sound BHO directly.

While the North Sound BHO as a covered entity is bound by the Health Information Portability and Accountability Act (HIPAA) for compliant disposal of unsolicited PHI, there is always potential risk for breach when the receiver of the PHI is not the correct agency for action. In addition, it is not a sound business practice from a HIPAA minimum necessary and compliance perspective to unnecessarily share PHI, even to another covered entity.

This letter is to serve as notice that effective April 1, 2018, unsolicited faxes that contain PHI from an inpatient provider requesting inpatient service authorization will be reported to the North Sound BHO Privacy Officer, who will make a report to the respective inpatient facility Privacy Officer. Further, the materials will be destroyed in compliance with HIPAA without further reading or action.

Questions by inpatient facilities related to inpatient authorizations, for clarification or assistance, may be directed to Volunteers of America (VOA) at 800.707.4656

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Rudow", written over a horizontal line.

Matt Rudow  
Privacy Officer

CC:

Betsy Kruse, Deputy/Clinical Director

Sandy Whitcutt, Crisis Services Manager

Michael McAuley, Quality Specialist, Crisis Services

Pat Morris, Senior Director of Behavioral Health, VOA

File