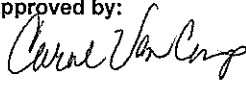
 <p>HAWAII HEALTH SYSTEMS CORPORATION</p> <p>POLICY</p>	<p>Quality Through Compliance</p>	<p>Policy No.:</p> <p>CMP 021A</p>
		<p>Revision No.:</p> <p>N/A</p>
<p>Subject:</p> <p>Privacy and Security Council</p>	<p>Issued by:</p> <p>Corporate Compliance</p>	<p>Effective Date:</p> <p>September 20, 2012</p>
	<p>Approved by:</p>  <p>HHSC Board of Directors By: Carol VanCamp Its: Secretary/Treasurer</p>	<p>Supersedes Policy:</p> <p>N/A</p>
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Last Review Date: August, 2012. Next Review: August, 2015

I. **PURPOSE:** Because State and Federal privacy and security regulations are complex, this policy establishes a Privacy and Security Council to oversee HHSC's response and implementation of privacy and security rules, regulations, and laws.

II. **POLICY STATEMENT:** The Privacy and Security Council promotes a collaborative approach to information security and privacy at HHSC. The Council provides advisory and oversight services for HHSC facilities and the Corporate Office in the following information security and privacy areas:

- Strategic planning related to information assurance
- Policies, standards, and guidelines
- Training and education
- Information and technology security and privacy control processes
- Due care practices related to laws, regulatory obligations and, contractual commitments (e.g. Payment Card Industry Data Security Standards)
- Risk assessments and management
- Incident response and management practices for security breaches
- Information resources for technology innovation and business initiatives
- Information security and privacy for HHSC technology and institutional information in any form (e.g. electronic or paper).

III. **DEFINITIONS:**

Privacy and Security Council: A body of representatives from HHSC's Corporate Office and facilities that includes information technology, compliance, and administrative personnel. This Council oversees HHSC's policies and procedures regarding implementing privacy and security regulations.

HIPAA: Broad set of Federal law contained in the Health Insurance Portability and Accountability Act (45 CFR Parts 160, 162, and 164) that govern the transmission of insurance and other information for medical purposes. HIPAA also addresses the privacy requirements and rights for disclosing individually identifiable health information. HIPAA compliance includes the Privacy Rule, the Security Rule, and the Breach Notification Rule.

IV. POLICY

- A. HHSC will establish a Privacy and Security Council ("Council") charged with overseeing implementation of effective enterprise computer security and information privacy solutions and to assure compliance with applicable Federal and State rules, regulations, and laws.
- B. The Council shall meet in conjunction and in partnership with the Corporate Compliance Committee.
- C. The Council shall be advisory to the HHSC Administration and the HHSC Board of Directors.
- D. Membership of the Council, at a minimum, shall include:
 - 1. HHSC Security Officer
 - 2. Chief Compliance and Privacy Officer (Chair)
 - 3. Chief Information Officer
 - 4. HHSC IT Operations Director or representative
 - 5. Regional Compliance and Privacy Officers
 - 6. HHSC General Counsel and Director of Human Resources
 - 7. Representatives from HHSC regions as determined by the CCPO or other representatives as requested by the RCEOs.
- E. The Council shall review and advise HHSC facilities on HIPAA Security regulations, the Hawaii State Laws relating to the State Information Privacy and Security Council, information security practices and policies, information technology solutions addressing security issues, and other issues as deemed appropriate to the security and privacy of HHSC's information as conveyed in any form.

V. APPLICABILITY: This policy applies to all HHSC facilities and the HHSC Corporate Office.

VI. AUTHORITY: 45 CFR Parts 160, 162, and 164; Act 315 Haw. Sess. Laws 2012; Act 10, Haw. Spec. Sess. Laws 2008.