

Conditions met = X	<b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b> For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.	Score given by Division
X	<p>This Information Systems and Data Management plan provides for the strongest possible Local Management Entity capacity, and will be based on the existing capable and proven Blue Ridge Area Authority (BRAA) Information Systems infrastructure and staffing. Maintaining an adequate, talented Information Systems department will be critical through FY04 and FY05 at a minimum. During this time, the LME will extend its geographic scope and clinical care management responsibility to encompass the Rutherford-Polk and Trend areas (Rutherford, Polk, Transylvania, and Henderson). This staffing and expertise is needed to give the LME capacity to develop the mechanisms for processing/paying claims from the eight county provider network, as well as billing/reporting "upstream" to the state via the IPRS system and to other payers.</p> <p><b>1. The local business plan is in compliance with IPRS (Integrated Payment and Reporting System) and MMIS (Medicaid Management Information System) requirements. (weighted)</b></p> <p>Blue Ridge Area Authority has signed the Division of Medical Assistance Memorandum of Agreement (MOA) and Trading Partner Agreement.</p> <p>Blue Ridge Area Authority has completed format testing and has received certification for the ANSIX12N834 transaction and ANSIX12N837 transaction. Preparations are being made for content testing of these two transactions, and are on schedule to be in production in March, 2003. BRAA anticipates testing the ANSIX12N835 transaction for receiving remittance advice information electronically from IPRS by April 2003.</p> <p>Blue Ridge Area Authority is currently using the Report2Web reports and the IPRS Browser interface in our facilities for managing IPRS eligibility, enrollment, and Common Name Data System (CNDS) association. The majority of associations of active consumers have been made in the CNDS. BRAA will be utilizing 128 bit encryption that meets the triple DES (Double Encryption Standard) standard for transfer of all IPRS transactions. Preparations are being made to utilize the remainder of the reports and functionally perform utilization management and financial management of our client and agency accounts. BRAA has the ability to adhere to all of the MMIS and IPRS requirements at this time except for final testing as noted above.</p> <p>See page 25 of State Plan 2002 – Local Business Plan (hard copy).</p>	
X	<p><b>2. The local business plan adheres to the state technology standards. (weighted)</b></p>	

Conditions met = X	<p><b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b></p> <p>For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.</p>	Score given by Division
X	<p><b>a)</b> Blue Ridge Area Authority has reviewed the statewide technical architecture as published by the Information Resources Management Commission (IRMC) and is in compliance with the exception of revisions to some of our existing policies and procedures as noted below.</p> <p>Current policies are in place that address Security and Access Controls to Data and Systems, as well as Privacy and Confidentiality.</p> <p>BRAA has a policy that addresses the dissemination and training on policies, an integrated part of our employee orientation and new-user training regimen. Existing procedures provide evidence of user training on policies that relate to security, asset protection, privacy, and confidentiality.</p> <p>The Blue Ridge Area Authority's information systems team maintains system architecture documentation and procedures including a thorough network map, a database of all equipment and software, as well as information on all users and their access levels.</p> <p>Regular monitoring of the network is performed and critical events are logged. Records of server maintenance, software and patch installation, and virus detection software installations/updates are maintained.</p> <p>A secure frame relay network has been implemented with required security, data and operating system backups, redundancy and effective disaster recovery procedures currently in place surrounding the critical central computer systems and resources. A comprehensive Blue Ridge Area Authority Safety Plan is in place that addresses facility-level disaster recovery procedures including required staff action surrounding computer system shutdown, etc.</p> <p>Outlying agencies and remote users of the system that do not have the access to the secure frame relay network access have in place virtual private network facilities and/or access through a secure, protected network access point.</p> <p>Several levels of protection exist including firewalls, virus scanning, and email scanning mechanisms to all outside communication links that combine to provide the requisite security to protect consumer data and financial assets of the organization. Triple DES (Data Encryption Standard) security is in place for communication protocols (primarily TCP/IP networking topology). Password protected and/or encrypted email facilities are implemented where necessary.</p> <p>An off-site contingency system, which provides back up capacity in the event that the primary IBM Unix-based computer system is unavailable, has been in use for almost 3 years. This configuration replicates core data from the primary to the contingency system on a nightly basis. The primary system includes a mirrored disk subsystem and is backed up nightly to allow for full recovery. Backup tapes</p>	

Conditions met = X	<p><b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b></p> <p>For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.</p>	Score given by Division
	<p>are rotated offsite to another area authority facility, then in sequence to a safety deposit box at a local bank. The unix system is protected by a backup power supply system to assist in continued operation.</p> <p>In addition, a separate backup system is utilized to support the approximately 12 file, e-mail, and other servers currently in use. Additional servers are utilized as mail scanners, mail servers, a Microsoft Exchange server, etc. Resources are in place with both replacement hardware and software ready to be installed if any component fails. In many cases there exist contracts in place with national or local vendors to provide expedient repair/replacement of failed equipment.</p> <p>The primary software system in use (CMHC Systems MIS) provides the flexibility that permits the staff to modify the data structures to create new data structures, add data elements to existing structures, and develop flexible reporting capability. Tools are available within the software to provide the staff with the ability to define, design, and produce required outputs in either electronic or other formats for reporting and management, purposes. This flexibility will permit the MIS to provide the data management tools required to implement the functionality as outlined in the business plan. This functionality provides access to staff via the 400+ personal computers currently in the BRAA network.</p> <p>Blue Ridge Area Authority has been submitting electronic transactions for state required mandates and insurance claims for several years.</p> <p>Currently under development is an Electronic Medical Record (EMR) system with many elements completed and in use by the clinical, administrative, and clerical staff. This effort will be sustained to its completion. Plans call for electronically scanning in externally produced documents as digitized images to associate with the internally generated EMR documents. This technology will use an encryption technology to assure document security and accuracy including a form of secure electronic signatures. An integrated records management system supplied by the software vendor is being used to warehouse the electronic medical record documents for storage and retrieval by the staff. This capability is in use currently, and will be continued for operation by the LME to support the needs of the LME.</p> <p>Electronic secure submission of claims and an authorization system are in place to provide the tools required for a successful transition to the LME functionality. This "managed care organizational system" capability was first utilized for the Carolina Alternatives system in the past. This proven technology will provide the tools necessary to collect, analyze and provide statistical and management data for the LME to operate a larger multi-provider network. The LME's ability to manage care, authorizations, and claims processing/payment is a critical function in the establishment of a viable provider network poised to deliver the vast majority of services in the catchment area.</p> <p>The current information system includes functions for the financial accounting</p>	

Conditions met = X	<p><b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b></p> <p>For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.</p>	Score given by Division
X	<p>including budgetary, accounting, purchasing, accounts payable, accounts receivable, first and third party billing, payroll inventory, fixed assets accounting, cost finding support and management reporting. Other functions that have been implemented include a human resource system and many other subsystems required for business functions.</p> <p>The current Blue Ridge Area Authority information system has been designed to accommodate additional capacity. The network currently supports four Blue Ridge Counties; Rutherford and Polk Counties are being added onto the system as part of a management agreement for Rutherford-Polk Area Program that is in place since January 1, 2003. Additional planning and system design will be conducted for Henderson and Transylvania Counties prior to the inception of the LME.</p> <p>The LME's responsibility for adhering to State technology standards encompasses both the network required to support its own operations as well as the support of a viable provider network. The LME will incorporate capacity for the provider network support in its network design and function. The LME will also expect members of the provider network to have the capability of efficient electronic communication for authorization requests, HIPAA compliant billing, electronic medical records, email, secure email, and other forms of data interchange.</p> <p><b>b) Blue Ridge Area Authority is in compliance with the Wiring Topologies and Data Link standards as published by IRMC.</b> (See network system narrative and network diagram in 3c below.)</p> <p>A comprehensive Blue Ridge Area Authority Safety Plan is in place that addresses facility-level disaster recovery procedures including required staff action surrounding computer system shutdown, etc. Procedures are in existence that describes the process for data backup and recovery in the event of a disaster.</p> <p>Blue Ridge Area Authority has an established standard for Network Operating Systems that is in compliance. The main behavioral health software requires the UNIX operating system. Most other applications run in the Microsoft Windows environment. There is an existing classroom training regimen that requires all staff to participate in training on the required elements to implement adequate security, asset protection, privacy and confidentiality and assist them in the performance of their respective duties and responsibilities. Information Systems provided training is recorded via an email/survey based system. The Human Resources department maintains current organizational charts.</p> <p>Blue Ridge Area Authority performs regular network monitoring and performs regular maintenance of all primary computer systems. Hardware and software maintenance/support contracts exist on all primary systems including the behavioral health software (CMHC Systems), email, virus detection, internet monitoring, email filtering, and others.</p>	

Conditions met = X	<p><b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b></p> <p>For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.</p>	Score given by Division
	<p>Blue Ridge Area Authority has a three-stage virus detection/prevention strategy. This includes an initial email filtering server, anti-virus software running on our mail server, and anti-virus software running on all area authority workstations. This system has kept BRAA virtually free from virus infections, with no downtime as a result of virus infections over the past five years.</p> <p>Blue Ridge Area Authority has appointed co-HIPAA Coordinators, and is actively working on HIPAA compliance in the areas of code sets and privacy. BRAA is monitoring those rules not yet finalized to be prepared for security and electronic signature compliance by the required deadline. BRAA is confidently equipped and staffed to deal with the final security regulations when they are finalized. An existing policy addresses/allows electronic signature for medical record documents.</p> <p>Blue Ridge Area Authority is in the process of implementing HIPAA compliant tables, transactions, and all standards for electronic communications pursuant to Final Rule and Notice 45 CFR Parts 160 and 162. SecureFX has been acquired as a secure file transfer protocol software package that will be used for IPRS and other HIPAA-related data transfers.</p> <p>See page 26 of State Plan 2002 – Local Business Plan (hard copy).</p>	
X	<p><b>3. A policy is evident that adopts all security procedures established by the Division of MH/DD/SAS both for the protection and the safeguarding of electronic data, financial assets and other material resources. (weighted)</b></p>	
X	<p><b>a. There is evidence that the LME has the capacity to adhere to state required security procedures.</b></p> <p>As a matter of policy, the Local Management Entity will comply with all security procedures set forth in applicable State and Federal Regulations. The existing Area Program staffs are currently demonstrating their ability to implement HIPAA compliant Transactions with the planning and implementation of the State IPRS System. These same technical and professional skills will be applied to the Security procedures evidenced in other aspects of Federal and State regulations. Staff are drafting a policy that evidences the capacity to adhere to state required security procedures and that documents the movement towards compliance of the federal regulations of proposed rule 45 CFR Part 142. Its anticipated time line is July 2003</p>	
X	<p><b>b. There is documentation of the movement towards compliance of the federal regulations as found in the HIPAA Security and Electronic Signature Standards: Proposed Rule 45 CFR Part 142 Published August 12, 1998. Note Final Rule expected in 2003.</b></p> <p>Staffs have reviewed the Proposed Rule on Security and Electronic Signature</p>	

Conditions met = X	<p><b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b></p> <p>For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.</p>	Score given by Division
X	<p>Standards as well as the developments around revisions to the HIPAA Security Standards. As of the date of this draft, we have learned that the Final Rule is to be published in the Federal Register on February 20, 2003. We will examine the final rule as well as industry response to it, and proceed with the appropriate steps to ensure that compliance in the LME systems is achieved prior to the Compliance due date.</p> <p><b>c. There is a description of how the LME will demonstrate compliance with electronic claims submission, electronic data transfer and HIPAA transactions in item 16 above in addition to overall MIS capabilities. This includes contact information for LAN (Local Area Network) and IT management staff and documentation of IT infrastructure including LAN, WAN (Wide Area Network), and workstation capacity.</b></p> <p>The LME will demonstrate compliance with electronic claims submission, electronic data transfers and HIPAA transactions as outlined in 2a above. The LME will be responsible for the submission of HIPAA-compliant transactions into the Integrated Payment and Reporting System (IPRS) in order to receive State and Medicaid funds for services provided both directly by the LME as well as those provided by LME contract providers throughout the eight county region.</p> <p>Current LAN and IT management staff are:</p> <p style="padding-left: 40px;">Information Systems Director: George Scott (828) 258-3511 x2174; george@blueridge.org</p> <p style="padding-left: 40px;">WAN Manager: Ken Griffin (828) 258-3511 x. 2171; kennyg@blueridge.org</p> <p>Attachment I.3.c.1 is a current diagram that depicts our frame relay network. This network supports the Blue Ridge and Rutherford-Polk Area Programs. Additional connectivity will be required to incorporate the Henderson and Transylvania County operations of the LME into the network.</p> <p><u>System Narrative:</u> The current configuration for the Blue Ridge Center (BRC) CMHC/MIS is based on an IBM RS/6000 6H1 minicomputer with 6 coprocessors, 2000 Mb RAM, 180 GB hard disk storage, and a tape drive, and IBM's AIX Unix 4.3 operating system. An IBM RS/6000 J40 minicomputer with 6 coprocessors, 784 Mb RAM, 50 GB hard disk storage, 2 tape drives, and IBM's AIX Unix 4.3 operating system is deployed as a contingency system and crucial data is replicated from the 6H1 each night. Both of these minicomputers support 225+ concurrent user connections with a user base of over 400 staff. The software applications include the CMHC/MIS (a fully integrated menu driven application that includes the central database and financial, personnel, payroll, A/P, A/R, fixed assets, on-line progress notes, managed care, contract management, reporting and system management functions). Some reporting processes are passed to stand alone Personal Computers (PCs) through Microsoft SQL Server and ODBC sources to PC</p>	

Conditions met = X	<p><b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b></p> <p>For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.</p>	Score given by Division
	<p>applications such as the MS Office 97 Suite or the MS Office XP suite. PC and Server operating systems are currently standardized on Windows 95, Windows 98, Windows 2000 Professional, Windows XP Professional, Windows NT 4.0 Server, and Windows 2000 Server. Additional information is obtained, generated, or verified via the State Information Processing System (SIPS) via linkage with the RS/6000 CMHC/MIS application.</p> <p>There is a variety of equipment connected to the IBM RS/6000. Four types of dumb terminals are used: Texas Instruments 924, Texas Instruments 928, WYSE 160, and WYSE 60. PCs connect via JSB-Multiview emulation software. Printers consist of dot-matrix, laser, and ink jet. Five printers are directly connected to ports, another 100+ printers are attached to terminals or PCs. Approximately 35 connections are direct serial cables to the IBM RS/6000. Another 350+ connections are made via a private fiber connection, copper cable, ten-frame relay circuits, three wireless bridges, and a voice-grade T1 circuit. Equipment utilized include Adtran DSU/CSU's, Cisco routers and switches, 3Com Hubs and switches, and Multi Tech statistical multiplexors ranging in capacity from four to 32 ports each. There a number of dial-up modem connections that are verified through a Cisco 2500 router and connect to the WAN and/or the RS/6000. In addition to these existing connections within the Blue Ridge network, 120 additional PCs will be added to the system with the migration of the Rutherford-Polk network in early Spring 2003.</p> <p>The NT Network consists of five Windows 2000 Servers and three NT 4.0 Servers and over 325 network client PCs. The wide area network (WAN) is a 10/100 Mb switched Ethernet WAN. Network equipment includes multiple Cisco 3500 series switches, a Cisco 5000 switch and other miscellaneous Cisco and 3Com switches, hubs, and routers throughout the 4-county area. The core router is a Cisco 3600 series with VoIP modules providing 12 VoIP connections. Three remote county locations have Cisco 2600 series routers with VoIP modules that allow them to connect to the multiple lines to contact the main location without paying long distance charges. The VoIP modules tie into a NEC 2400 series PBX. Internet access is provided via a wireless ISP (Skyrunner), and connects to the network at a Cisco Pix firewall with the fail-over option installed. Some services are provided via a Multitech Remote Access Server. Applications running on the multiple NT Servers include: MS-Exchange (300+ users), eREQ (an in-house authored web-based requisitioning system that interfaces with the CMHC/MIS PO system), internet use monitoring, HUD Manager 2000, SPT2000, NCSNAP, CAP Paid Claims Management, Staff Activity Application, HR-Leave Reporting System, MOAD-IS Inventory Tracking package, Ciscoworks, Castlerock SNMP network management software, as well as basic file and print services.</p> <p>This WAN provides a BUI (Browser User Interface) to clinicians for real-time client assessment and evaluation data entry as well as integrated Treatment Plans and Service Notes in the CMHC/MIS. BRC is moving rapidly toward completion of its Electronic Medical Record system. The overall Information Systems infrastructure</p>	

Conditions met = X	<b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b> For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.	Score given by Division
X	<p>supports the existing Area Program facilities in the full spectrum of clinical, centralized billing, financial management, and communications needs. Additional capacities, including the electronic medical record and tele-medicine, are currently in development.</p> <p>The LME has a strong desire to link its information systems with major providers across the eight counties, permitting the exchange of information and health care transactions that will be both efficient and in full compliance with HIPAA and prevailing standards. The expansion of the LME WAN to accommodate additional providers is one possibility to accomplish this goal; other avenues will also be explored.</p> <p><b>d. There is a list of the specific actions taken towards compliance of the federal regulations as found in the HIPAA Health Insurance Reform: Standards for Electronic Transactions: Announcement of Designated Standard Maintenance Organizations: Final Rule and Notice 45 CFR Parts 160 and 162, Published August 17, 2000. Note: Compliance Date October 16, 2003 (with extension).</b></p> <p>As reflected in 2a, above, specific actions have been taken toward compliance of the federal regulations as found in the HIPAA Health Insurance Reform. Appropriate systems are being developed to handle 834, 835 and 837 HIPAA transaction sets in concert with the rollout of the State IPRS system for Division of Mental Health and Medicaid Funds. Compliance with Standardized Transaction Sets for all Other Funding Sources will be achieved by the October 16, 2003 Compliance due date.</p>	
X	<p><b>e. A list is included that identifies the specific steps towards compliance of the HIPAA Privacy regulations as found in 45 CFR Parts 160 and 164 Standards for Privacy of Individually Identifiable Health Information: Published December 28, 2000 with a Compliance Date April 14, 2003 and the Federal CFR regulations for Substance Abuse. In addition, a policy statement adopts the privacy rules as prescribed in NC General Statutes and the Division.</b></p> <p>As reflected in 2a, above, specific actions have been taken toward compliance of the federal regulations as found in the HIPAA Health Insurance Reform. In addition, specific steps towards compliance of the HIPAA Privacy Regulations as found in 45 CFR Parts 160 and 164 Standards for Privacy of Individually Identifiable Health Information have been identified, and are outlined as follows:</p> <ul style="list-style-type: none"> <li>➤ Identification of HIPAA Project Team Members</li> </ul>	

Conditions met = X	<b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b> For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.	Score given by Division
X	<ul style="list-style-type: none"> <li>➤ Attendance at HIPAA Business Information Flow Assessment Training conducted by DHHS Project Management Organization [August 2001]</li> <li>➤ Review of Self-Assessment Instruments</li> <li>➤ QI Director attended HIPAA Medical Privacy Rule: Guide to Compliance for Public Agencies Training by the Institute of Government [May 2002]</li> <li>➤ Funds included in current year budget for HIPAA Compliance Efforts [July 2002]</li> <li>➤ Independent CMHC Consultants Site Visit to Review HIPAAA Compliance Planning and Implementation Efforts [November 2002]</li> <li>➤ HIPAA Overview provided to some Contract Provider Agencies [December 2002]</li> <li>➤ Attendance at Statewide HIPAA Coordinator's Meetings of the NC Council [2002-2003, Ongoing]</li> <li>➤ Participation in Institute of Government's Medical Privacy electronic mail list serves supporting compliance efforts among Area Mental Health Programs, Public Health, and DSS Agencies [Ongoing]</li> <li>➤ Review of Existing Policies and Revision to achieve conformity with HIPAA Privacy Requirements, NC General Statutes, and 42 CFR Substance Abuse regulations [ongoing]</li> <li>➤ Adoption of HIPAA Compliant Policies by Board [projected March 2003]</li> <li>➤ Modifications to Physical Facilities and Medical Records Management made to be in compliance [January 2003 on]</li> <li>➤ Training planned for all appropriate Area Program Staff</li> <li>➤ Limited Technical Support and Resource Identification planned for Provider Network Staff</li> </ul> <p><b>f. A policy is evident which addresses the intent to comply with other HIPAA regulation once they are proposed and finalized, e.g. National Provider ID Number (NPIN), National Plan Number and National Individual ID Number, etc.</b></p> <p>As a matter of policy, the Local Management Entity will comply with all security procedures set forth in applicable State and Federal Regulations. The draft policy on Data Security is in process and will address Blue Ridge' intent to comply with other HIPAA regulations once they are proposed and finalized, Its anticipated time line for completion is April 2003. Review of the Policy with regards to new HIPAA regulations that are promulgated will be conducted on an ongoing basis. This includes other HIPAA regulations still to be proposed and adopted including, but not limited to National Provider ID Number (NPIN), National Plan Number and National Individual ID Numbers.</p>	

<b>Conditions met = X</b>	<p><b>IX. INFORMATION SYSTEMS AND DATA MANAGEMENT</b></p> <p>For more information or explanation of this item, <a href="#">go to the Local Business Plan</a> on the web. Once you have the web document open, click on the bookmark tab on the left. You will see the document's table of contents. Clicking anywhere in the table of contents will take you directly to that part of the document.</p>	<b>Score given by Division</b>
	See page 26 of State Plan 2002 – Local Business Plan (hard copy).	
<p><b>Enter List of Attachments:</b></p> <p>Attachment I.3.c.1: Network Diagram</p>		
<p><b>IX. Information systems and data management—Total Score given by the Division</b></p>		

Attachment I.3.c.1

Attached is a current diagram that depicts our frame relay network. This network supports the Blue Ridge and Rutherford-Polk Area Programs. Additional connectivity will be required to incorporate the Henderson and Transylvania County operations of the LME into the network.

Network Diagram:

