

# ALCOHOL, DRUG ADDICTION AND MENTAL HEALTH SERVICES BOARD OF CUYAHOGA COUNTY

## POLICY STATEMENT

**SUBJECT:** HIPAA SECURITY REGULATIONS COMPLIANCE POLICY  
**EFFECTIVE DATE:** May 27, 2026

---

### PURPOSE

---

The purpose of this policy is to describe the Alcohol, Drug Addiction and Mental Health Services Board of Cuyahoga County (ADAMHS Board) plan for complying with the Security Regulations of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) (42 U.S.C. 1320d - 1320d-8, and regulations promulgated thereunder, 45 CFR Parts 160, 162 and 164). Where applicable, this policy also reflects the Board's obligations under 42 CFR Part 2, governing the confidentiality of substance use disorder patient records.

### SCOPE

---

This policy applies to all ADAMHS Board workforce members, including employees, volunteers, trainees, and contractors, as well as Business Associates and their subcontractors, who create, receive, maintain, transmit, or otherwise handle electronic protected health information (ePHI) on behalf of the Board. Compliance with this policy is a condition of employment, engagement, and any contractual relationship with the Board.

### POLICY

---

The ADAMHS Board is committed to:

1. The confidentiality, integrity, availability, authenticity, and non-repudiation of all electronic protected health information (ePHI) that is created, received, maintained, or transmitted.
2. Protecting against any reasonably anticipated threats or hazards to the security or integrity of ePHI.
3. Protecting against any reasonably anticipated uses or disclosures of ePHI that would not otherwise be permitted or required under HIPAA or applicable federal and state law, including 42 CFR Part 2.
4. Ensuring that ADAMHS Board workforce members and the ADAMHS Board of Directors are compliant with all HIPAA Security Standards.

### RESPONSIBILITIES

---

It is the responsibility of the ADAMHS Board Chief Executive Officer to establish the policies and procedures necessary to implement this Policy. The Security Officer is responsible for developing, implementing, and maintaining those policies and procedures, and for ensuring ongoing compliance with the HIPAA Security Rule.

### RELATED POLICIES

---

This policy is implemented through the following Board security policies, which together constitute the Board's HIPAA Security Program:

- Security of Client Information - Administrative Safeguards
- Security of Client Information - Physical Safeguards

- Security of Client Information - Technical Safeguards

In the event of a conflict between this policy and any of the above, this policy governs.

## REFERENCES

---

- 42 U.S.C. 1320d - 1320d-8
  - 45 CFR Parts 160, 162, and 164
  - 42 CFR Part 2 - Confidentiality of Substance Use Disorder Patient Records
  - HIPAA Security Regulations, 45 CFR Part 164 Subpart C
  - ADAMHS Board Policy on Privacy and Confidentiality of Client Information
- 

Signed by:

*Patricia James-Stewart, M.Ed., LSW*

AEEBCB3D8553442...

Patricia James-Stewart, M.Ed., LSW  
Board Chairperson

Signed by:

*Jason Joyce*

E44D00AF38EF407...

Jason Joyce  
Chief Executive Officer

5/27/2026

Approval Date

5/27/2029

Review Date