



Facility/Department: All Departments	Integrity Policy #: 1.52
Subject: Confidentiality Procedures & Requirements	Administrative <input checked="" type="checkbox"/> Clinical <input checked="" type="checkbox"/> Human Resources <input checked="" type="checkbox"/>

Purpose: To ensure the confidentiality of clients and establish procedures for accessing and amending records. Both H.I.P.A.A. and 42 C.F.R. Part 2 protect patient identifying information. This is information that would identify a client as an alcohol or drug abuser, either directly or indirectly. This includes any information, whether oral or written, that would directly or indirectly reveal a person's status as a current or former client.

Procedures

Client Consent

Upon admission all clients receive a copy of *Integrity's Patient Notice*, which describes confidentiality laws and client's rights under H.I.P.A.A. and 42 CFR Part 2.

Authorization for Release of Information forms is completed and signed by the client for parties whom the client permits disclosure to. The form remains in the clients' clinical record.

In order to satisfy the requirements of both 42 C.F.R. Part 2 and H.I.P.A.A., Integrity House utilizes a written authorization form which contains each of the following items

If the Recipient Is:	"To Whom" Must Include:
1. An Individual	The name of the individual
2. An entity with a treating provider relationship	The name of the entity
3. Third party payer	The name of the entity
4. An entity without a treating provider relationship	The name of the entity, plus: <ul style="list-style-type: none"> • Name of the individual participant(s); or • Name of the entity participant(s) who has treating provider relationship; or • General designation of individual or entity participant(s) or class of participant(s) who has treating provider relationship

1. The name or general designation of the program(s) making the disclosure (Integrity House);
2. Name of the individual or organization that will receive the disclosure;
3. The name of the client who is the subject of the disclosure;
4. The purpose or need for the disclosure;
5. A description of how much and what kind of information will be disclosed;



6. The client's right to revoke the consent in writing, and the exceptions to the right to revoke or, if the exceptions are included in the program's notice, a reference to the notice;
7. The program's ability to condition treatment, payment, enrollment or eligibility of benefits on the patient agreeing to sign the authorization by stating either that the program may not condition these services on the member signing the authorization, or the consequences for the client refusing to sign the authorization.
8. The date, event or condition upon which the consent expires, if not previously revoked;
9. The signature of the client (and /or other authorized person);
10. The date on which the authorization is a signed.

A specific Promotional Release Authorization must be completed for any public relations and/or media activities. **Prior to any public appearance on behalf of Integrity, Inc., a client must be approved to participate in the event by either the program director or his/her designee.** Clients have the opportunity to request that Integrity House restrict certain uses or disclosures of the client's information. If Integrity does agree then it must abide by the restriction and not use or disclose the restricted information (unless it is necessary to treat the client in an emergency situation). Any agreed upon restriction must be appropriately documented in the clients clinical record.

Disclosures

If Integrity House receives a request for a disclosure of a client's records that is not permitted by the regulation, Integrity must refuse to make the disclosure. It must be done in a way that does not reveal that the client has ever been diagnosed or treated for an alcohol or drug problem.

Client identifying information may be disclosed with written authorization. Limited disclosures are permitted in the following circumstances:

1. Internal communications (with respect to need to know)
2. Non-client-identifying information
3. Medical emergency
4. Court order
5. Crime at Integrity/against Integrity personnel
6. Research
7. Audit and evaluation
8. Child abuse and neglect
9. Qualified Service Organization/Business Associate Agreement

Integrity requires that staff make reasonable efforts to limit the information, being shared to the minimum necessary to accomplish the intended purpose. Integrity medical staff, counselors, and program directors have access to all protected health information within the programs. Other clinical staff has access to protected health information needed for the purpose of consultation and case management. Administrative staff, including systems engineers, has access to only the specific protected health information needed to carry out their duties.

All staff must document an accounting of disclosures made without client authorization. Accountings must include the date of disclosure, the name and address of the person who received this information, description of the disclosed information and a statement of the purpose of the disclosure.



Clients have the right to receive an accounting of disclosures of their own protected health information made prior to the date of the request. This accounting does not have to include disclosures made with client authorization.

Re-disclosure

42 C.F.R. Part 2 requires any disclosure made with written client authorization to be accompanied by a written statement that the information disclosed is protected by federal law and that the recipient cannot make any further disclosure of it unless permitted by the regulations.

Inappropriate disclosure of confidential information may result in disciplinary action.

Client Access to Records

Clients may request access to his/her records in writing. Directors must act upon receipt of this request in a timeframe no later than 30 days.

Record Amendments

Clients have the right to request that Integrity amend health information kept in their records. This request must be made in writing to the director and include a reason to support the amendment. Integrity may deny the client's amendment request if Integrity determines that the information or record is accurate and complete.

Staff Training

All new employees receive confidentiality training during orientation on their first day of employment, from his/her immediate supervisor.

Clinical staff receives a detailed training on the use of the various consent forms during their first week of employment, from his/her immediate supervisor.

Senior Management Approval: *[Signature]* Date: 5/23/18

President & CEO Approval: *[Signature]* Date: 5/23/18

Initial Policy Date: 9/15/1998

Revised: 1/14/2011; 5/8/2018

PRC: 2/17/2011