

GOODWILL BRIDGEPOINTE SERVICES, INC.

**HEALTH INSURANCE PORTABILITY AND
ACCOUNTABILITY ACT (HIPAA)**

HEALTH INFORMATION PRIVACY POLICY

Purpose:

It is the policy of Goodwill BridgePointe Services, Inc. and all its entities to maintain the privacy of health information in compliance with all applicable federal and state laws. Goodwill BridgePointe meets the definition of health care provider under HIPAA and therefore is subject to the federal statute in its function as a provider. HIPAA does not cover health information received by Goodwill BridgePointe in its function as employer (such as for workers compensation, short- or long-term disability, information received based upon the Americans with Disabilities Act or Family Medical Leave Act).

Definitions:

Business associate is a person to whom Goodwill BridgePointe discloses protected health information so that the person can carry out, assist with the performance of, or perform on behalf of, a function or activity of the organization.

Minimum necessary requires Goodwill BridgePointe to make all reasonable efforts not to use or disclose more than the minimum amount of information necessary to accomplish the intended purpose of the use or disclosure.

Privacy Officer oversees all activities related to the development, implementation, maintenance of, and adherence to the organization's policies and procedures covering the privacy of protected health information in compliance with federal and state laws. The Director of Operations is the designated as the Privacy Officer at Goodwill BridgePointe.

Protected healthcare information (PHI) is information that is created or received by Goodwill BridgePointe that relates to the past, present, or future physical or mental treatment or condition of the individual; the provision of care to an individual; or the past, present, or future payment for the provision of care to an individual; and that identifies the individual or to which there is a reasonable basis to believe that the information can be used to identify the individual. PHI refers to all modes of information, including verbal, written, and electronic. Further, PHI refers to all non-healthcare information relating to an individual as well.

Disclosure:

Goodwill BridgePointe provides healthcare services (as defined by HIPAA) and therefore creates and obtains healthcare information as well as bills for its services. To the extent that it creates, maintains, and discloses PHI, Goodwill BridgePointe will do so in confidence, and in accordance with applicable state and federal regulations, including HIPAA. Any PHI will be secured against unauthorized access. When PHI is disclosed, only the minimum necessary information will be released. PHI will not be disclosed in any marketing communications without prior authorization.

The organization will obtain authorization prior to the disclosure of PHI in accordance to applicable state and federal laws.

Authorizations:

Written authorization will be obtained prior to the disclosure of PHI in accordance with the agency Confidentiality Policy and Procedure. Only the minimum necessary information will be disclosed.

Rights:

Persons receiving services from Goodwill BridgePointe have the right to access, inspect, and copy their PHI that is maintained in accordance with HIPAA privacy regulations. They have the right to request the amendment of PHI and can request restrictions on the uses and disclosures of PHI. However, the organization can decline to comply with such requests.

The person has the right to request an accounting of disclosures of PHI made without prior written authorization in accordance with HIPAA privacy regulations. Questions or concerns about the above should be brought to the Privacy Officer.

Access:

Access to case records containing PHI will be limited to the individual receiving services, their

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representative(s), the primary case manager, supervisor, individuals providing direct service, persons providing authorized quality assurance functions, others authorized by the Privacy Officer; or as required by law.

Research:

The organization may disclose PHI to researchers when their research has been approved by an institution review board. The Board must have reviewed the research proposal and established protocols to ensure the privacy of PHI. Any disclosure by Goodwill BridgePointe must be approved by the Privacy Officer.

Security:

Any PHI will be secured against unauthorized access.

Primary case records of persons receiving services will be secured in a central, locked location within the main facility. Access will be limited to those involved in providing service to the individual or as identified above. The Access Log in each individual's file will be used to identify who accessed the record, when, and for what purpose. Out guides will be used to identify who removed the file from the Central Records room and the date the file was removed. All files are returned to the Central Records room no later than the end of each day in accordance with established policy. The record shall be handled so as to maintain the privacy and confidentiality of information at all times. Records regarding PHI will be maintained for persons receiving services and for **four years after end of the term of the contract in the year the client was discharged from services.**

Other PHI will be maintained in as secure and confidential manner as possible. Verbal disclosure shall be made so as to reasonably ensure that only those for whom authorization has been obtained receive the information. Employees should refrain from discussing PHI in public areas.

Written information will be maintained in a secure and confidential manner. Precautions will be taken to limit incidental access. Unsecure PHI will not be left unattended in offices (e.g. left on desks). Paper containing PHI will be shredded prior to discarding. Working files and materials are to be locked up at night and any time staff are not in their office. No PHI will be placed in mailboxes unless it is secured in a sealed envelope addressed to the person for which it is intended.

Electronic information

Access to electronic information shall be limited. The following safeguards shall be in place:

§ Access to each computer and network shall be password protected. Employees shall ensure the security and privacy of passwords.

§ Monitors should be positioned so as to minimize unauthorized access to PHI.

§ Where applicable, all PHI shall be saved to a network server.

§ All computers shall be shut down at the end of the workday (except as required for network functions).

§ Information stored on the network server shall be backed up regularly. Back up media is maintained in a lock box at Chase Bank on Lewis & Clark Parkway.

§ When individual computers or hard drives are "retired", the hard drive will be destroyed.

§ Electronic media (floppy disks, CDs, tapes, etc.) containing PHI shall be maintained in a secure and private manner. These items are destroyed when no longer needed.

§ Passwords shall be provided to new employees as appropriate. Upon termination, the password shall be retired.

§ Employees shall ensure the PHI transmitted via email is secure and private.

§ Fax machines shall be maintained so as to ensure the security and privacy of faxed materials. When sending a fax, a cover sheet containing a privacy statement shall be used. When receiving a fax, the material shall be removed from the machine as soon as it is received and immediately delivered to the person for whom it is intended OR placed in a secure area.

§ When making copies or printing to a central machine, materials should be removed from the machine immediately. It is recommended that when printing PHI, a cover sheet be used.

Discipline:

The organization will discipline, in accordance with agency policy, employees for improper access, use, or disclosure of PHI or other confidential information as outlined in Personnel Policy #540 in the Employee Handbook. Further, the organization will discipline, in accordance with agency policy, employees for improper installation of software and/or internet downloads as outlined in Personnel Policy #519.

Notice:

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A summary notice of the organization's HIPAA privacy practices will be provided to each individual prior to receiving services. No later than the first date of service, each person receiving services will receive a copy of the Notice. Written acknowledgement of the receipt of the Notice will be obtained.

Additionally, copies of the Notice will be posted conspicuously throughout the organization and on its website, and will be available upon request.

Complaints:

Any individual who suspects that Goodwill BridgePointe is in violation of HIPAA regulations has the right to file a complaint with the Privacy Officer or the US Department of Health and Human Services. Complaints should be made in writing to the Privacy Officer. The Privacy Officer shall review all complaints and respond appropriately.

Goodwill BridgePointe will not take any retaliatory action against any person for filing a complaint, assisting in an investigation, or otherwise opposing any act under HIPAA regulations.

Training:

All employees of Goodwill BridgePointe will receive an orientation to the agency's HIPAA policies and procedures. The training will be provided as necessary and appropriate for the employee to carry out his/her job functions.

Amendments:

Goodwill BridgePointe will amend this Policy to comply with HIPAA privacy regulations.

Business Associates:

Goodwill BridgePointe will require business associates to comply with applicable HIPAA privacy regulations. These include using or disclosing PHI only as necessary to perform its function; returning the PHI (where feasible) at the end of the contract; helping Goodwill BridgePointe comply with privacy standards; binding subcontractors with access to PHI to similar promises.

A written agreement will be developed and signed by both parties. The Privacy Officer will maintain copies of all agreements.

Questions, concerns, comments:

For more information about Goodwill BridgePointe's privacy practices contact the Privacy Officer at 1329 Applegate Lane, Clarksville, IN 47129 or by calling 812-283-7908.