

General Policy F7

HIPPA Main Security Policy

It is the policy of Catholic Charities, Inc. that all personnel must preserve the integrity and the confidentiality of treatment and other sensitive information pertaining to our consumers. The purpose of this policy is to ensure that Catholic Charities, Inc. and its officers, employees, and agents have the necessary treatment and other information to provide the highest quality service possible while protecting the confidentiality of that information to the highest degree possible so that consumers do not fear to provide information to Catholic Charities, Inc. and its officers, employees, and agents for purposes of treatment. To that end, Catholic Charities, Inc. and its officers, employees, and agents will--

- ❖ Collect and use individual treatment information only for the purposes of providing treatment services and for supporting the delivery, payment, integrity, and quality of those services. Catholic Charities, Inc. and its officers, employees, and agents will not use or supply individual treatment information for non-health care uses, such as direct marketing, employment, or credit evaluation purposes.
- ❖ Collect and use individual treatment information only--
 - ❖ To provide proper diagnosis and treatment.
 - ❖ With the individual's knowledge and consent.
 - ❖ To receive reimbursement for services provided.
 - ❖ For research and similar purposes designed to improve the quality and to reduce the cost of health care.
 - ❖ As a basis for required reporting of health information.
- ❖ Recognize that treatment information collected about consumers must be accurate, timely, complete, and available when needed. Catholic Charities, Inc. and its officers, employees, and agents will--
 - ❖ Use their best efforts to ensure the accuracy, timeliness, and completeness of data and to ensure that authorized personnel can access it when needed.
 - ❖ Complete and authenticate treatment records in accordance with the law, ethics, and accreditation standards.
 - ❖ Maintain records for the retention periods required by law and professional standards.

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- ❖ Not alter or destroy an entry in a record, but rather designate it as an error while leaving the original entry intact and create and maintain a new entry showing the correct data.
- ❖ Implement reasonable measures to protect the integrity of all data maintained about consumers.
- ❖ Recognize that consumers have a right of privacy. Catholic Charities, Inc. and its officers, employees, and agents will respect consumers' individual dignity at all times. Catholic Charities, Inc. and its officers, employees, and agents will respect consumers' privacy to the extent consistent with providing the highest quality treatment possible and with the efficient administration of the facility.
- ❖ Act as responsible information stewards and treats **all** individual treatment record data and related financial, demographic, and lifestyle information as sensitive and confidential. Consequently, Catholic Charities, Inc. and its officers, employees, and agents will:
 - ❖ Treat all individual treatment record data as confidential in accordance with professional ethics, accreditation standards, and legal requirements.
 - ❖ Not divulge treatment record data unless the patient (or his or her authorized representative) has properly consented to the release or the release is otherwise authorized by law, such as communicable disease reporting, child abuse reporting, and the like.
 - ❖ When releasing treatment record data, take appropriate steps to prevent unauthorized re-disclosures, such as specifying that the recipient may not further disclose the information without patient consent or as authorized by law.
 - ❖ Implement reasonable measures to protect the confidentiality of treatment and other information maintained about consumers.
 - ❖ Remove patient identifiers when appropriate, such as in statistical reporting and in treatment research studies.
 - ❖ Not disclose financial or other patient information except as necessary for billing or other authorized purposes as authorized by law and professional standards.
- ❖ Recognize that some treatment information is particularly sensitive, such as HIV/AIDS information, mental health and developmental disability information, alcohol and drug abuse information, and other information about sexually transmitted or communicable diseases and that disclosure of such information could severely harm consumers, such as causing loss of employment opportunities and insurance coverage, as well as the pain of social stigma. Consequently, Catholic Charities, Inc. and its officers, employees, and

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agents will treat such information with additional confidentiality protections as required by law, professional ethics, and accreditation requirements.

- ❖ Recognize that, although Catholic Charities, Inc. owns the treatment record, the patient has a right of access to information contained in the record. Catholic Charities, Inc. and its officers, employees, and agents will--
 - ❖ Permit consumers access to their treatment records except when access would be detrimental to the patient under the so-called "therapeutic exception" to patient access. In such cases, Catholic Charities, Inc. and its officers, employees, and agents will provide an authorized representative access to the patient's records in accordance with law, professional ethics, and accreditation requirements.
 - ❖ Provide consumers an opportunity to request correction of inaccurate data in their records in accordance with the law and professional standards.