



HIPAA Privacy Standards and Code of Conduct

- Confidential client information is not to be discussed in public areas without consent of parent/guardian. Ask parent/guardian if it is ok to discuss information.
- No paperwork (e.g., files, reports, notes) containing confidential information is to be left unattended at any time. This includes your desk area, unless it is in a secure area.
- Telehealth environments must also provide these safeguards for client information. This includes the environments that are you working from as well as the environment that the client/caregivers are in. All PHI must be kept private and confidential in the environment that you are working in.

REMEMBER: Use the minimal amount of personal information required for that communication

COMPUTERS:

- Client information on computer screen is **never to be left unattended** or in public view. This includes when providing telehealth services.
- Computer screen **cannot be viewed by unauthorized personnel** or seen from public areas. This includes when providing telehealth services and working from home.
- All employees must have a **password protected login** (screensaver) to access confidential information.
- All employees must have a **User ID and password** to access confidential information on the Therapy West 2 Network.
- Confidential information must be printed from a secure/supervised location.
- No Therapy West 2, Inc. documents with client PHI should be stored on a personal computer.

DESK AREA/THERAPIST SPACE/HALLWAYS/INTERVENTION AREAS

- The following documents are considered confidential and therefore must not be left unattended or in view of public and must be put away inside a cabinet or drawer when not attended
 - Charts
 - Evaluation forms/booklets
 - IEP/IFSP
 - Client phone list
 - Reports
 - Running notes
 - Schedule
 - Videos (Are property of Therapy West 2, Inc. and client)

COMMUNICATION

- Written (no verbal) consent stating exact entity authorized to communicate with **must be obtained prior to communicating** with any person besides funding source and parent (if child under 18 years old). If child is over 18 years old, you must get signed consent from client to speak with parents even if parents are paying for the therapy.
- This includes:
 - Phone/verbal communications with other agencies, teachers, schools, doctors, therapists

- **E-mail** correspondence: You must obtain consent to use email **prior** to using email and you **MUST** send **PHI encrypted**
- Written correspondence: this includes reports, running notes, treatment plans, communication book, etc...
- Verbal communication with parent/guardian/caregiver
 - Therapist **must ask permission to speak** about client when in public areas
 - Messages left on **answering machines**:
 - HOME/WORK/OFFICE/CELL: message may not include any PHI. **DO NOT** state child’s name, funding source, birthdate, type of therapy, etc. You **CAN SAY** something like this: “Hello this is so and so from Therapy West, please call me at...”

PAPERWORK

- All paperwork with client information must be kept in a secured/locked at Therapy West 2, and when providing telehealth services, it must be kept in a secure/locked location.
- When it is **ABSOLUTELY** necessary to have client information outside of Therapy West 2 for home or school visits (e.g., natural environment visits, IEP, School-based) it must be kept in the direct supervision of the therapist or in a locked storage area without public access.
- A signed TW2 Release of Information must be obtained from parent prior to releasing any Therapy West 2 patient records to outside agency. If parent has signed a different type of records release form (i.e. from a lawyer’s office who is requesting the records) an owner of TW2 must see release form first and approve the release of records.
- Shredding of PHI documents: All documents that contain PHI are shredded within 48 hours of being scanned and uploaded into the EMR system or kept in a secure locked location that is monitored by Therapy West 2, Inc.
- Documents are maintained until client reaches age of 21 years or 7 years after services are provided, whichever is the longer duration.

If there are any circumstances that do not fall under these guidelines, you are required to have authorization by an owner of TW2, the privacy official, before proceeding with any action. Failure to do so will result in a disciplinary action.

HIPAA Attest Form

I attest that I have reviewed this “HIPAA Training Document.”

I understand that if I have any questions about any information or regulations described in this document, that I must obtain clarification from the Therapy West 2 Privacy and Compliance officer, Beth White.

Printed Name

Date

Signature