FOOTHILLS GATEWAY, INC

Confidentiality

POLICY:

It shall be the policy of Foothills Gateway, Inc. that every person receiving or seeking services has the same legal rights and responsibilities as other individuals including the right to have the information concerning the person be handled in a confidential manner.

PROCEDURE:

1. All identifying information regarding persons requesting or receiving services shall be treated as confidential and will be handled in accordance with applicable law and with the Foothills Gateway, Inc. Policy and Procedure concerning Confidentiality and following procedures pursuant to the Family Educational Rights and Privacy Act of 1974, PL 94-142, and PL 99-157, the Colorado Open Records Act, CRS 25.5-10 as amended, the Rules and Regulations of Health Care Policy and Financing (HCPF), and the Health Insurance Portability and Accountability Act (HIPAA).

2. Master records for the person receiving or seeking services shall not contain information about another person receiving or seeking services.

3. Conversations between Foothills Gateway, Inc. staff concerning persons receiving or seeking services will be held in private offices or conference rooms, away from areas open to the general public or other staff not involved with the person.

4. Confidential information about individuals shall not be discussed with unauthorized persons at any time, for any reason.

5. Staff will receive training during their initial orientation to the agency concerning confidentiality of records and information about persons in service. This training is required by HCPF under minimum training guidelines. Trainings will include information regarding:

    a. All information about persons receiving or seeking services being confidential.
    b. Access to the master files.
    c. Responsibility of staff to keep employee and program participant information safe from unauthorized disclosure.
    d. Confidentiality and Master Records and Access to Information procedures.

6. Staff shall be expected to read and understand the agency's policies and procedures concerning Master Records and Access to Information, Master Records Maintenance, Human Rights Committee, and HIPAA.

7. All Foothills Gateway, Inc. information, data, articles, files and phone lists should be treated as confidential information.

7/00 ...5/16; 5/17; 6/18