

EAGLEVISION MINISTRIES, INC.
Substance Abuse Program

Operating Policies and Procedures

Subject: Confidentiality

POLICY

Confidentiality of client records is guided by 42 C.F.R. and HIPAA. Using these as a guideline, Eaglevision is committed to maintaining the confidentiality of client records by adhering to the following procedures:

- Clients are to be fully informed upon admission to treatment of their legal rights relating to confidentiality, privacy and release of information. Clients are given a copy of the "Client Notice of Confidentiality" for their own records, and a signed copy of this form is maintained in the case file.
- Clients are presented with appropriate consent form (Medicaid, non-Medicaid, criminal justice) for release of information and are informed of their right to revoke that consent as allowed by law.
- Clients are to be informed of their right to file a complaint with the Recipient Rights Advisor and the procedure for doing so.
- All substance abuse staff are required to participate in an in-service training within 15 days of hire to familiarize themselves with the clients' legal rights to confidentiality, privacy and release of records. Staff members sign an acknowledgment that they understand these client rights and agree to abide by them. Such acknowledgement becomes part of the permanent personnel file.
- Client records are maintained in locked filing cabinets in an area out of common use, and only staff have keys to these cabinets. Client files may not be retained at staff desks, but must be returned to the appropriate locked cabinet before the close of each business day.
- Client records maintained in electronic form are protected by password unique to each staff member.
- Client files and electronically-stored files may not be removed from the building by any staff member without the express written permission of the Program Director. Such permission will generally not be given unless specific reasons such as the necessity to prepare for a subpoena exist.