

# **Disability Advocates of Kent County**

## **Privacy Policy**

Safeguards have been established to ensure the privacy and confidentiality of Protected Health Information (PHI) to protect against a breach or disclosure. DAKC's HIPAA Privacy Officer is the Independent Living Director.

### **Staff Responsibilities**

DAKC staff shall be informed regarding their respective responsibilities relative to safeguarding PHI and the consequences and accountability for violation of these responsibilities.

### **Conversations in Public Areas**

Conversations regarding consumers/employees should occur in a private area with the door closed. Conversations regarding consumers/employees should not take place in any public area such as the kitchen, restroom, copy room, mailbox area, lobby, or hallways.

### **Paging Policy**

When paging a staff person to the front desk area for a meeting, use only the staff person's name asking them to come to the front desk area. A consumer's first name is only to be used, if required, on the paging/intercom system.

### **Work Station Policies**

1) When consumers are receiving services from DAKC, staff must close office doors to safeguard the consumers' PHI. If a staff person does not have an office where the door closes, staff must take the consumer to an available office and close the door.

2) Speaker phone should only be used when absolutely necessary when PHI may be discussed. If speaker phone is used, staff must close their office door. If a staff person is in an office that does not have a door, staff must make the call from an available office, or not put the consumer on speaker phone.

3) Hard copies of consumer files should be closed and covered and computer screens should be free of any PHI in the event of leaving the desk briefly, out of office view, or receiving visitors to a staff person's workstation.

### **Printer/Fax/Copier Policy**

Documents addressed to or identifiable to an employee will be placed in that employee's mailbox face down. An employee should check his/her mailbox throughout the day to remove any documents containing PHI. If an employee is gone for an entire day, the supervisor (or another assigned employee) is responsible for checking that person's mailbox for documents containing PHI.

Any person finding paperwork in the printer, fax machine or copier that contains PHI and is not identifiable to a staff person will try to determine to whom the document belongs. This may involve personally asking staff members and/or sending an internal email to all staff. The person finding the document is responsible for the safekeeping of the document and locating its owner. If that cannot be done, the document should be hand-delivered to the Privacy Officer.

When sending a fax, a cover sheet must be used at all times and free of PHI. Fax coversheets contain the following tagline:

*Confidential: This fax and all contents contain information from Disability Advocates of Kent County which may be privileged, confidential, or otherwise protected from disclosure. The information is intended to be for the addressee only. If you are not the addressee, any disclosure, copy, distribution or use of the contents of this message is prohibited. If you have received this fax in error, please notify us immediately at 616-949-1100 and shred this fax. Thank you.*

When verbally requesting a fax number for transmission of PHI purposes, fax number should be confirmed by repeating fax number to person providing it. When sending a fax, confirm fax number typed into machine with fax number provided to prevent any errors in sending.

### **Opening Mail Policy**

Mail marked confidential should only be opened by the person to whom it was addressed. The person opening the mail should stamp the envelope with the date received and give it to the appropriate person. If necessary, the receiver of the confidential mail should staple the envelope to the piece of mail so he/she has documentation of when it was received.

### **Sign-in Sheet Policy**

Persons not employed by DAKC who are attending meetings at DAKC shall sign-in using the Meeting Sign-in Sheet. This is to ensure that all non-staff members will not disclose any PHI or other confidential information they may have obtained while on our premises.

Volunteers and Interns shall sign in using the designated sign in sheet at the front desk upon entering the building. This is to ensure that all non-staff members will not disclose any PHI or other confidential information they may have obtained while on our premises.

### **Meeting Announcement**

The HIPAA statement should be re-iterated as follows:

DAKC is HIPAA compliant. We maintain the security and privacy of all PHI. Signing your name to our sign-in sheet indicates that you will not disclose any PHI or other confidential information you may have inadvertently obtained while on our premises.