




Policy and Procedures

<u>Department Name</u> Utilization Management		
<u>SUBJECT:</u> Behavioral Health Confidentiality, Security, and Integrity of Information	<u>POLICY NUMBER:</u> UM-025	
<u>APPROVAL:</u> 	<u>EFFECTIVE DATE:</u> 2-19-20	<u>REPLACES :</u> New Policy

- I. **POLICY:** All client information, clinical records, and quality improvement data, whether in electronic or paper form, shall be safely and securely maintained against loss, destruction, tampering, and unauthorized access or use.

- II. **CONTACT:** Utilization Management Director

- III. **PERSONS AFFECTED:** All Children's Network of Southwest Florida

- IV. **PROCEDURES:**
 1. All client records shall be maintained in a secure location. A secure location is defined as a locked room or a locked cabinet. Keys to secure locations shall only be accessible by program leadership and administrative staff responsible for file management.

 2. Quality improvement data and meeting minutes shall be maintained in a confidential manner in order to secure and protect the integrity of client information.

 3. All Children's Network of Southwest Florida employees shall agree to maintain client confidentiality. This agreement shall be documented on the Children's Network of Southwest Florida Confidentiality and HIPAA Agreement form and maintained in the employee's personnel file.

 4. All contracted staff (i.e., consultants) shall be required to sign a working agreement to include provisions to safeguard information in conformity with state and federal law and regulations.

 5. Children's Network of Southwest Florida staff shall not confirm that a client receives services from Children's Network of Southwest Florida or disclose information identifying a client as receiving services from Children's Network of Southwest Florida unless the client consents in writing for the release of the information, the disclosure is allowed or required by

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the child, the name and address of the person responsible for the care of the child, and the facts requiring the report. The report may include any other pertinent information.

14. If Children's Network of Southwest Florida is dissolved, sold, etc., all client records will become the property and responsibility of the successor corporation. Part of the Board of Director's final responsibility is to identify an appropriate human service organization that will agree to provide care, maintenance, and such active supervision as is necessary throughout their remaining useful life. This responsible organization, when named by the Board of Directors, shall be entitled to all fees associated.