

**ACADEMY  
Policy Manual**

**SUBJECT: EMPLOYEE CONFIDENTIALITY**

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**Effective Date:** 11/01/08

**Last Review Date:**

**Approved by:**

**Revision Date(s):**

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**PURPOSE:**

It is the intention of this company to adhere to a strict code of ethics on privacy and confidentiality of our client's protected health information, as well as the day-to-day business transactions of this office. It is the responsibility of every employee, volunteer, student, physician, resident and/or business associates to respect and protect the privacy rights of our clients, their families and our staff and employees. All health information contained in the medical records, staff files, computer systems, or office files is strictly confidential information. In addition, any information about the company's business, accounts receivable, billing or business associates, which is disclosed or becomes known in the course of the business must be kept confidential. This includes all written, oral, or electronic health and business information. This information should only be shared with those individuals who NEED TO KNOW in the course of performing their duties and office functions.

**Breaches of Confidentiality**

When an employee carelessly or unintentionally accesses, reviews, or reveals confidential information without a need to know, confidentiality has been breached. This includes discussing patients in public areas, break rooms, elevators, or off premises, leaving client health documentation in public areas, or leaving confidential information on computer screens, etc.

When an employee accesses, reviews, or discusses confidential information for his personal curiosity, a confidentiality breach has occurred. This includes accessing birth dates, addresses, or phone numbers of friends. If an employee accesses any of this confidential information for personal gain or malice, he/she will be automatically terminated.

**Non-Retaliation**

No disciplinary action or retaliation of any kind will be taken against any employee, staff member, client, student or other individual for filing a complaint, "in good faith", on a perceived issue, a problem, a concern, or a violation of our Privacy practices. Employees, staff and our clients have the right to be treated fairly and with respect.

In "good faith" means that an individual actually believes or perceives the information reported to be true.

**PROCEDURE:**

A signed Confidentiality Statement will be required as a condition for employment, contract, association or appointment with this practice. This same agreement will be renewed annually with our regular HIPAA training course.

The signed Confidentiality Statement of each individual will be filed in their employee file.

Any individual who becomes aware of a possible breach of confidentiality shall be required to report it to our Privacy Officer. The Privacy Officer will report the situation Executive Director or designee. Failure to report a breach of confidentiality will result in disciplinary actions.

All allegations reported to the Privacy Officer, will warrant a complete investigation into the situation. Corrective actions will be enforced if it is deemed to be necessary. These may include but not be limited to:

- A written warning and additional confidentiality training
- Time off without pay and additional confidentiality training
- Immediate termination

The same type of disciplinary actions will apply to anyone who would not report a breach.

All pertinent details of any reported breach will be documented and filed. Appropriate actions will be taken as a result of the breach.

All client records will be kept for five (5) years beyond his/her 18<sup>th</sup> birthday and personnel records will be maintained for a period not to exceed 10 years.