

## **CONFIDENTIALITY AND PRIVACY POLICY**

### **General**

Philadelphia Works and its contractors, sub-contractors, training providers, vendors and partners (hereinafter generally referred to as “Philadelphia Works”) fully respect the rights of participants served, including their right to privacy. It will hold information concerning the participants in the strictest of confidence. Such information will not be disclosed to anyone unless authorized by the participant or otherwise permitted by law. Philadelphia Works complies with all confidentiality laws, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and other state and federal privacy regulations.

### **HIPAA**

HIPAA law requires that Philadelphia Works keeps a participant’s Private Health Information (PHI) private. PHI includes, but is not limited to:

- Personal address and phone number
- Date of birth and social security number
- Contact information for participant’s legal next of kin or guardian
- Medical history and information of participant
- Health information of participant
  - Insurance information (pre-certification/DSHS/Medicare)
  - Treating hospital/clinic number assigned to patient
  - Anticipated admission date and time

### **Protecting Confidentiality**

Philadelphia Works may disclose or otherwise make available PHI to its service providers and vendors to assist with business operations, which are required to keep this information secure. In addition, Philadelphia Works must not disclose information that compromises security, confidentiality, or integrity of this sensitive data. No employee or former employee, without consent of Philadelphia Works, shall use for this data for his or her own benefit or disclose any confidential information obtained during the course of employment.

Philadelphia Works takes the following actions to ensure that PHI is secured and protected:

1. Accurate Filing of Participant Information: Philadelphia Works staff shall guard against misfiling of participant information by examining all data in the file to confirm that it belongs to the particular participant.
2. Lock and Secure PHI: Philadelphia Works staff shall never leave sensitive information unattended and must store such information in a locked drawer, cabinet, safe or other secure container when not in use. Access to this PHI, whether physical or electronic, is restricted to those individuals who have a “need to know.”
3. Public Areas: Initiating contact in social or public settings shall be avoided. Staff should also refrain from disclosing information regarding participants through routine conversations with third parties or in public places, such as elevators and corridors or any place where a discussion can be overheard. Finally, participant records should be kept out of areas that are accessible to the public, or not be left on a desk or exposed on a computer screen unattended.
4. Proper Disposal: PHI shall never be disposed of in the trash can. Any document thrown in the trash is open to the public and therefore a breach of information. Data from computers and electronic storage devices, including copy machines, shall be removed prior to disposal in a confidential recycling bin or shredder.
5. Electronic Data Systems: Philadelphia Works staff shall maintain privacy while entering participants’ data into the various electronic data systems, such as CWDS, Kronos, Efforts to Outcomes and CAPS. Email communications are not considered secure unless the email system is encrypted. Encryption helps protect the security and privacy of files as they are transmitted or while on the computer.
6. Password Protected Systems: Philadelphia Works uses password protection, which helps to prevent unauthorized access to PHI or to other user and email accounts. All users are assigned unique user names and are required to create strong passwords for access to systems, which are changed periodically.
7. Proper Authorization: If a participant decides to receive services from another agency, or if a request for PHI is received from an organization outside of the Philadelphia Works network, a proper signed authorization to release information must be received from the participant prior to releasing any such material.