

		Policy Number: AG-070
Subject:	SECURE MAILING AND FAXING OF CLIENT INFORMATION	
Section:	ADMINISTRATE GENERAL	
Effective Date: 01/01/2011	Review Date: 04/01/2015	
	Revised Date:	
<input type="checkbox"/> New Policy	<input type="checkbox"/> Supersedes Policy Dated:	
Issued by: HR Administrator	Concurred with and Approved by: Jim Burns, Director Initial: _____	
Cross Reference:		
Distribution:	All employees of Family Focus	

POLICY

Family Focus will abide by all HIPAA, Federal and State guidelines in regard to proper mailing and faxing procedures. All Family Focus members are required to use, disclose, and request the minimum necessary amount of client information to accomplish the purpose of the use, disclosure, or request. This includes client information stored electronically, on paper, generated on reports, or shared verbally.

The exceptions to the Minimum Necessary Requirement are as follows:

1. Disclosures to or requests by referral sources.
2. Uses or disclosures to the individual who is the subject of the information.
3. Uses or disclosures made pursuant to an authorization signed by the individual or the personal representative of the individual
4. Uses or disclosures required by law.

PROCEDURE

1. Disclosures of client information by Family Focus workforce include:
 - a. Routine disclosures – Disclosures made on a regular or recurring basis to referral sources, insurance companies, etc. known to Family Focus workforce members.
 - i. When making routine disclosures of client information, Family Focus workforce members are to make reasonable efforts to limit the client information disclosed to the minimum necessary to accomplish the purpose of the disclosure.
 - ii. Examples of routine disclosures are; insurance companies/payor source.
 - b. Non-routine disclosures – Disclosures other than “routine disclosures”.
 - i. Non-routine disclosures require the approval of the Director. Family Focus workforce members who are asked to make a non-routine disclosure must obtain authorization from the Director.

2. Requests of client information by Family Focus workforce members.
 - a. Routine and non-routine requests.
 - i. Family Focus workforce members must make reasonable efforts to limit requests for client information to the minimum necessary to accomplish the purpose of the request. Requests for treatment purposes are exempted from this requirement.
3. Any Family Focus personnel who believe they are receiving more client information than is necessary to complete their duties must contact the Director for guidance.

MAILING OF CLIENT INFORMATION: *(also see policy AG-009 Clients right to Confidentiality)*

1. Client information mailed via postal carrier, delivery service, etc. sent to third parties.
 - a. Client information may be mailed to referring offices without an authorization from the client.
 - b. The client information is to be placed in a sealed envelope (adhesive &/or taped) and addressed to intended recipient. The envelope must contain either the direct Family Focus department name &/or address OR if the envelope has the general Family Focus return address listed, the sender must write their department name in the return address area.
 - c. Mail that is returned to Family Focus as undeliverable will be routed to the correct department by the Family Focus HR Administrator.
2. Information sent directly to clients
 - a. Any information mailed from Family Focus (or its agents) directly to clients that is general in nature and sent to all clients &/or non-clients, e.g. newsletters, special event mailings that are not related to a specific case, etc. may be sent in an open format without being placed in a sealed envelope.
 - b. Any information mailed from Family Focus (or its agents) directly to clients such as, appointment reminders, case related correspondence, etc., must be placed either in a sealed envelope or on a fold-over style card. **Absolutely no open post card type mailings containing specific client information are to be mailed.**
 - c. The client information is to be placed in a sealed Family Focus addressed envelope and addressed to intended recipient. The envelope must contain either the direct department name and/or address OR if the envelope has the general Family Focus return address listed, the sender must write their department name in the return address area.

FAXING / SCANNING OF CLIENT INFORMATION

All Family Focus personnel will send client identifiable information by fax or scan only when mailing the document will not meet the needs of immediate client care. Some situations that meet these criteria include when the courts require immediate access to documentation.

All Family Focus personnel must limit client information transmitted via fax to the amount reasonably necessary to accomplish the stated purpose of the requester.

AUTHORIZATION REQUIRED VS. NOT REQUIRED:

1. Client information may not be faxed to any location without prior approval from the Director. All requests for client information concerning past client information must be routed to the Director.
2. Family Focus personnel are to contact the Director if he/she has concerns about faxing information in response to a request.

SAFEGUARDS FOR SENDING FAXES

1. All faxes sent from Family Focus containing client identifiable information must include a cover page that contains the Family Focus confidentiality statement. These coversheets are available at all fax machine locations. The cover page must be filled out completely and include contact information for the receiver to contact the sender of the fax if the fax has been received in error.
2. Family Focus personnel must make reasonable efforts to ensure that they send the fax transmission to the correct destination. Personnel must preprogram frequently used numbers into the machine to prevent dialing errors. For a new fax recipient, the sender must verify the fax number before sending the fax.
3. If a Family Focus personnel member becomes aware that a fax has been sent to the incorrect location in error, the personnel member must make every effort to retrieve the information faxed as quickly as possible. The situation must immediately be reported to the personnel member's direct supervisor and the Director.
4. All Family Focus personnel are responsible for becoming knowledgeable in correctly operating the fax machines located in their area or department per the operations manual or by contacting the Billing Clerk/Receptionist.

SAFEGUARDS FOR RECEIVING FAXES

1. Fax machines must be in secure areas with the department manager being responsible for limiting access to them.
2. Each department manager is responsible for ensuring that incoming faxes are properly handled, not left sitting on or near the fax machine but routed to the intended recipient as soon as feasible.

ENFORCEMENT

1. All managers are responsible for enforcing this policy and all Family Focus personnel are responsible for adhering to this policy. Family Focus personnel who violate this policy are subject to Performance Improvement process discipline up to and including termination from association with Family Focus in accordance with Employee Performance Policy ER-006.