SUBJECT: PRIVACY AND CONFIDENTIALITY OF INFORMATION	
DEPARTMENT: DURABLE & HOME MEDICAL EQUIPMENT	PAGE: 1 OF: 5
	EFFECTIVE: 06/01/2025
APPROVED BY: Jacob DeBoer - CEO	REVISED: 11/19/2025

PURPOSE:

To effectively and efficiently preserve and maintain the privacy and confidentiality of client, staff and business entity information in compliance with applicable laws, regulations and standards.

DEFINITIONS:

- Privacy: An individual's right to limit disclosure of personal information
- Confidentiality: The safekeeping of data/information so as to restrict access to individuals who have need, reason and permission for such access
- Protected Health Information: Health information that contains information such that an individual person can be identified as the subject of that information

POLICY:

- Confidentiality of data and information within Stronghold Accessibility Solutions applies across all systems and automated, paper and verbal communications, as well as to clinical/treatment/service, financial and business records and employee-specific information.
- All new employees, including contracted personnel and Board of Directors members, shall receive instructions about Stronghold Accessibility Solutions's Privacy and Confidentiality of Information policy and procedure during orientation.
- Significant changes to Stronghold Accessibility Solutions's Privacy and Confidentiality of Information policy are communicated to staff members, including contracted personnel and Board of Directors members, in verbal and written formats. These formats include, but are not limited to, in-service programs, staff and/or committee meetings, memos, emails, etc. Receipt of the information is documented by recipient signatures (may include electronic signatures) and retained by the company.
- All clients' personal and health information and billing data is considered confidential and will be disclosed at the discretion of the Administrator/Operations Manager only when authorized to do so by the client or his/her legal representative, when required by law, or on a "need to know" basis as necessary to carry out day-to-day business activities.
- Client information designated as "sensitive", i.e., HIV/AIDS diagnosis will be disclosed at the discretion of the Administrator/Operations Manager only when authorized to do so by the client or his/her legal representative, in response to a court order, or when required to provide care, treatment and/or services.

- All employees'/contractors' personal data, personnel records, work-related information and pay records are considered confidential to be disclosed at the discretion of the Administrator/Operations Manager only when authorized to do so by the employee or the employee's legal representative, when required to do so by law, or on a "need to know" basis as necessary to carry out day-to-day business activities.

- All company business records and/or dealings are considered confidential to be disclosed only when authorized to do so by Administration when required to do so by law, or on a "need to know" basis as necessary to carry out day-to-day business activities.

- Home care records, personnel records, computerized data systems and billing records shall be protected from loss, alteration, unauthorized use or damage and stored in a locked, secure location.

- Computer files are password protected against unauthorized use, alteration or damage.

- Passwords are not to be shared and are not to be displayed. Passwords are changed periodically at the discretion of Administration

- Client, employee and company privacy is protected during performance improvement activities.

- Information regarding clients shall not be displayed in areas that are available to the public and unauthorized personnel.

- All staff shall limit discussions of care, treatment and/or services to appropriate personnel within the company and/or to pertinent individuals under contract who have legitimate needs for accessibility of the information for delivery of care, treatment and/or services, effective functioning of the company, research and/or education.

- **Stronghold Accessibility Solutions's <u>Appointment & Service Coordination SMS Program</u>** offers SMS messaging to help us communicate with veterans and their households to schedule and coordinate appointments for installation and repair of home safety features and durable medical equipment provided by the Department of Veterans Affairs. **Mobile Opt in, SMS Consent, and phone numbers collected for SMS communication purposes will not be shared with any third party and affiliates for marketing purposes. Consent to receive SMS messages is not a condition of receiving services.** All information received through our SMS messaging campaign, medical, personal, or otherwise, shall be safeguarded, subject to the guidelines above, and only shared with those for whom the information is needed to perform the service.

PROCEDURE:

- The Administrator or his/her designee will review all request for information to determine whether the request will be honored.
- Access to information and records, including computer access, is determined by the requesting individual's "need to know" as follows:
- Company personnel, including contracted personnel directly involved in providing care, treatment and/or services to the client are permitted access to the client's healthcare records.
- Company personnel who require access to client records, employee records or agency records in order to accomplish their day-to-day tasks, are permitted access to needed records.
- Telephone requests for employee or client information are referred to the Administrator/Operations Manager.
- Requests for disclosure of client information to reimbursement organizations, healthcare organizations, physicians, licensing and/or accrediting bodies require a completed and signed consent form and are referred to the Administrator/Operations Manager.
- Consents of Release of Information Signatures:
    - Must be the original signature of the client or employee.
    - May be the signature of the legal representative if the subject has a court appointed guardian.
    - May be a legally authorized representative of the client or employee.
    - May be the signature of a family member if the client is unable to sign. If signed by a family member, the signature should be witnessed by an authorized company representative and the reason for the client's inability to sign documented.
    - If the validity of a signature is questioned, the company has the right to require a notarized signature.

- Safeguarding of Records:
    - Records may be photocopied by authorized employees as necessary to accomplish the day-to-day business of the company. The integrity and security of the records shall be maintained during the photocopying process, i.e., original records shall be kept face down and shall not be left unattended. Clerical and professional personnel may copy documents when authorized to do so as outlined below:
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Document(s)	Authority
Client Records or parts thereof	Administrator/Operations Manager, Branch Managers, Department Heads, Supervisors, others as designated by Administrator/ Operations Manager
Personnel Records or parts thereof	Administrator/Operations Manager, Branch Managers, Department Heads, Support Service Managers, others as designated by Administrator
Billing Records	Administrator/Operations Manager, Branch Managers, Billing Supervisor, others as designated by Administrator
Payroll Records	Administrator/Operations Manager, Branch Managers

    - Original paper or computer client records, personnel files, payroll and billing records shall be filed and shall not be removed from the site of origin, except by court order or for transfer to and from storage facilities or other authorized sites as needed to accomplish the day-to-day business of the company upon direction of Administration.
    - Records should not be left in unattended areas accessible to unauthorized individuals.
    - Records shall be stored in a manner that minimizes the possibility of damage from wind, fire and water.
    - Back-up copies of computer records shall be maintained as necessary to maintain integrity of the system.

- Relevant copies of the client's record may be left in the client's home as necessary to assist the company's staff in providing care, treatment and/or services to the client. The client/family/legal representative shall be instructed to maintain the security and confidentiality of the information left in his/her home.

- All copies of records, except those left in the client's home for the express purpose of providing education and/or for reference, shall be destroyed by shredding by Stronghold Accessibility Solutions at the time of the client's discharge. Copies used in the client's home shall be returned to the company's office for that purpose.

- Orientation and Education of Staff, including Contractors and Members of the Board of Directors includes:

  - Review of the company's confidentiality policies and procedures

  - Guidelines for photocopying records

  - Guides for prevention of unauthorized disclosure of client and employee information

  - The signing of a confidentiality statement that becomes part of each individual's personnel file