

Protection of Clients' Personal Health Information G & G LIVING CENTERS, INC.'s Privacy Practices

G & G Living Centers, Inc. has had a longstanding commitment to protecting the privacy of its clients' personal health information. A client's personal health information includes all client information, written and oral, including clients' personal information, clinical information, and financial information.

The U.S. Department of Health and Human Services recently published new federal standards protecting individuals' personal health information. These standards were published pursuant to a law enacted by Congress called the Health Insurance Portability and Accountability Act of 1996, and are commonly referred to as the HIPAA Privacy Rule. In general, the HIPAA Privacy Rule prohibits G & G Living Centers, Inc., and the members of its workforce, from using or disclosing clients' personal health information without the client's authorization, except where necessary to provide treatment to a client, obtain payment for the services received by a client, or conduct certain managerial and administrative activities necessary to the operation of G & G Living Centers, Inc.

In response to the standards established under the HIPAA Privacy Rule, G & G Living Centers, Inc. has formalized new procedures to better protect clients' personal health information from inappropriate use and disclosure. In particular, G & G Living Centers, Inc. has adopted a Minimum Necessary Policy limiting your access to clients' personal health information to only that information which is minimally necessary to perform your job responsibilities. You are strictly prohibited from using a client's personal health information, or from disclosing the information to another member of the organization, when you or the other member do not need to know the information to carry out the functions of your job responsibilities. Any member who uses or discloses a client's personal health information in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

The HIPAA Privacy Rule permits G & G Living Centers, Inc. to make certain disclosures, other than for treatment, payment, or health care operations activities, to persons or entities outside of the organization. To ensure compliance with these disclosure requirements, G & G Living Centers, Inc. has designated Manager of Quality Assurances as the Compliance Officer with authority to oversee these disclosures. Any request for a client's personal health information made by a client or another person outside of the organization should be referred immediately to the Compliance Officer for direction.

G & G Living Centers, Inc. expects all members of the workforce to make other reasonable efforts to safeguard clients' personal health information. Examples of the privacy practices that we expect you to follow include: avoiding discussions about clients in public areas; speaking quietly when discussing a client with family members in a public area; locking rooms where clients' records are stored; returning client records to storage so that they are not left unattended in areas where others can see them; and closing out computer databases containing client information when you are away from your desk.

POLICY

Minimum Necessary Standard

POLICY

G & G Living Centers, Inc. shall make reasonable efforts to limit the use and disclosure, and requests for, clients' protected health information to the minimum necessary to accomplish the intended purpose of the use, disclosure, or request.

PURPOSE

The purpose of this policy is to guide employees and other members of the workforce in meeting G & G Living Centers, Inc.'s commitment to protecting the privacy of clients' personal health information.

PROCEDURE

Minimum Necessary Uses of Protected Health Information

Permitted uses of clients' personal health information include uses necessary to carry out treatment, payment, and the health care operations activities of the organization. Clients' personal health information consists of the following general categories of records: facility directory information, personal records, clinical records, and financial records. Members of G & G Living Centers, Inc.'s workforce may only access and use those records that are necessary to carry out the functions of their job responsibilities. The following members or classes of members may access and use clients' personal health information as specified below:

<u>Members</u>	<u>Protected Health Information</u>
G & G Living Centers, Inc. Board Members	Facility directory information and protected health information provided by CEO or Operations Managers as necessary to carry out board activities
Chief Executive Officer Operations Managers	Facility directory information and all records as necessary to oversee the operations of G & G Living Centers, Inc.
Administrative Office Assistant Receptionist	Facility directory information and protected health information provided by administrative supervisors as necessary to

	carry out administrative activities as it relates to clients in assigned work area
Accounting Manager	Facility directory information and personal and financial records and limited clinical information as necessary to process payment or claims for reimbursement for services
IT Coordinator	Facility directory information and personal health information as necessary to carry out information technical support activities
Business Office Staff	Facility directory information and protected health information provided by the CEO as necessary to carry out billing and other business activities of G & G Living Centers, Inc.
Human Resources Manager Compliance Officer	Facility directory information and protected health information as needed to carry out compliance and potential abuse allegations against employees
Human Resources Staff	Facility directory information
Privacy Official	Facility directory information and all records as necessary to oversee compliance with the HIPAA Privacy Rule
Health Services Manager	Facility directory information and personal and clinical records related to health center clients
Professional Nursing Staff	Facility directory information and personal and clinical records to carry out client care activities as it relates to clients in assigned work area
Certified Medication Aide	Facility directory information and clinical records to carry out client care activities as it relates to clients in assigned work area

Living Support Staff

Facility directory information and protected health information provided by professional staff as necessary to carry out client care activities as it relates to clients in assigned work area

Director of Maintenance/

Facility directory information and protected health information provided by administration as necessary to carry out maintenance/environmental activities as it relates to clients in assigned work area

Maintenance Staff

Facility directory information

Volunteers

Facility directory information

Minimum Necessary Disclosures of Protected Health Information

Routine Disclosures

Routine disclosures of protected health information include permitted disclosures to employees and other members of the workforce as necessary to carry out treatment, payment, and the health care operations activities of the organization. Routine disclosures also include permitted disclosures to health care providers involved in the client's treatment (e.g., the client's personal physician) and permitted disclosures to health plans as necessary to obtain payment for services. A request from a covered health plan for an entire medical record must be justified as the amount that is reasonably necessary to accomplish the purpose of the request.

Other Disclosures

G & G Living Centers, Inc. may disclose protected health information, as permitted or required by law, to public officials authorized by law to receive the information and to a health care provider or health plan, which has or had a relationship with the client, for certain health care operations activities of the health care provider or health plan. Such disclosures shall be made only under the direction of the Compliance Officer pursuant to the criteria set forth in G & G Living Centers, Inc.'s privacy policies and procedures.

Protected health information may be disclosed to the G & G LIVING CENTERS, INC. board of directors as necessary to facilitate their governance of the operations of the facility.

Minimum Necessary Requests for Protected Health Information

Routine Requests

G & G LIVING CENTERS, INC. may request protected health information from others as necessary to carry out treatment, payment, and the health care operations activities of the facility.

Other Requests

G & G LIVING CENTERS, INC. shall make reasonable efforts to limit the protected health information requested for payment or health care operations activities pursuant to the criteria set forth in its privacy policies and procedures.

No Application

This minimum necessary standard does not apply to disclosures to or requests by a health care provider for treatment.

This minimum necessary standard does not apply to disclosures made to a client, or a client's personal representative, about the client's own protected health information.

This minimum necessary standard does not apply to disclosures made pursuant to, and consistent with, a client's authorization.

This minimum necessary standard does not apply to uses or disclosures required for compliance with the HIPAA standard transactions and code sets requirements.

This minimum necessary standard does not apply to disclosures of protected health information required by law.

Lorrie Meier, CEO_

Date

G & G LIVING CENTERS, INC.

CONFIDENTIALITY AGREEMENT

I understand and agree that, in connection with the performance of my duties as a member of G & G LIVING CENTERS, INC.'s workforce, I am required by law and by the policies adopted by G & G LIVING CENTERS, INC., to protect the confidentiality of personal health information created, received, used, disclosed, or maintained by G & G LIVING CENTERS, INC. I further understand and agree that the personal health information that I am obligated to protect includes clients' personal health information, including demographic information, whether it is recorded in writing or communicated verbally, that relates to (1) the past, present, or future physical or mental health or condition of the client; (2) the provision of health care to the client; or (3) the past, present, or future payment of health care provided to the client. I understand and agree that I may not access, use, or disclose any client's personal health information, except as permitted in the course of my duties as a member of the workforce, and that any violation of this confidentiality agreement will subject me to disciplinary action, up to and including termination of employment or association with G & G LIVING CENTERS, INC. I further understand and agree that my obligation to protect the confidentiality of clients' personal health information will continue after my employment or association with G & G LIVING CENTERS, INC. has ended.

Signature

Date

Title

Instructions: This confidentiality agreement must be signed by all members of the workforce, including employees, volunteers, trainees, students, and other persons who perform work for G & G LIVING CENTERS, INC., whether or not they are paid by G & G LIVING CENTERS, INC.

Privacy Practices Certification

I certify that I have received and read the G & G LIVING CENTERS, INC. Privacy Practices Handbook, and that any information that I did not understand has been satisfactorily explained to me.

Signature: _____

Name (Print): _____

Date: _____