

University of Michigan Psychological Clinic Confidentiality Guidelines

You are required to sign a formal confidentiality and security agreement as a condition of your work at the Clinic. These guidelines are intended to help you with some of the details of maintaining confidentiality and security at the Clinic.

You probably understand the importance of maintaining confidentiality, however, there are a number of specific safeguards of which you need to be aware. The Clinic's confidentiality rules are generally stricter than those of HIPAA (Health Insurance Portability and Accountability Act). There is a list of Protected Health Information related to HIPAA. Those items of information that the Clinic is likely to have and protect are: Names, addresses including Zip Codes, birthdates, telephone and fax numbers, email addresses, social security numbers, and health plan numbers. Training on applicable HIPAA regulations is required before work can be undertaken at the Clinic.

In addition, the Psychological Clinic has a great deal of other confidential information about our patients including written records, telephone and receptionists' contact, supervision, case reports in meetings and other sources. The Clinic staff, individually and collectively, is responsible for proper and continuous control of this information to protect the confidentiality of the patient. Records often contain sensitive personal data regarding clients and their families. All staff and students must treat all information regarding our patients with respect and confidentiality.

Files

Clinic files may not be removed from Clinic premises. There is a procedure for checking out patient files even for in-Clinic use: a sign-out card goes into the patient file and is removed when you sign the file back in. Client records may not be duplicated or reproduced in any way without prior written consent. If it is necessary to take copies out of the Clinic, black out identifying information.

Client records are strictly confidential. Client files are available only to the therapist and supervisor of that case. Other staff members do **not** have access to file information without permission from an administrative staff person.

Client records may **not** be removed from the Clinic records room except by specified individuals.

Client records may not be removed from the building *under any circumstances*.

If a patient requests access to or a copy of his/her file, bring this to the attention of the office manager. Although patients have a legal right to their files, we can withhold information that may be damaging to them.

Patient records may be released to another therapist or agency only after the Clinic has received a release of information form signed by the patient.

Use of files for research: The following are necessary before research using Clinic files can be undertaken: (a) description of research; (b) signed research form – co-signed by the Clinic Director once research has been approved by Senior Staff; and (c) approval by the Human Subjects Review Committee.

Correspondence

In your correspondence with patients (and their families if this becomes necessary), use envelopes that give only the U of M and street address in the return address. Do not use the envelopes that say Psychological Clinic.

E-mail correspondence with patients must be deleted as soon as possible and outgoing email should include the verbatim official disclaimer.

Requests for sharing information by any means must be in writing and signed by the patient.

Phone calls

If you call a patient at work or home and the patient isn't the one who answers the phone, do not identify yourself as being from the Clinic. Just leave your name and phone number if you want the person to call you back.

Phone messages given to you will have only the patient's initials so that they may be placed in your mailbox.

Mail boxes

Nothing with a patient name may be placed in your mailbox.

Miscellaneous

Avoid discussing patients when in the waiting room, lounge, library, in the halls, or outside the Clinic.

Even legitimate discussions of matters related to client service should **not** take place in any public place, including "public" areas of the Clinic building (e.g., halls, restrooms, reception, secretarial area, etc.)

Staff and students are **not** to discuss information concerning a patient with any person outside the Clinic without a written release form.

Never acknowledge in a phone conversation or correspondence or conversation outside the Clinic that a person is a patient at the Clinic. For example, if someone calls and wonders what time John Doe's appointment is over, don't acknowledge even implicitly that John Doe is in treatment here. The same goes for employers, creditors, etc.

The fact that an individual has sought or is receiving services from the Clinic is privileged information and should **not** be shared outside of the context of service to the individual.

Incidental contact with patients outside the Clinic is always a possibility and it is necessary to avoid this if you can, or avoid acknowledging the patient unless he/she initiates contact.

When discarding any notes or forms that bear patient names or identifying data you must shred it rather than just tossing it in the trash. Do not shred anything that does not need shredding, but err, if you must, on the side of being conservative.

All staff and students should review the Clinic's Policy and Procedures Manual sections on record keeping and case files.

The Confidentiality Statement must be signed by all staff - junior, senior, clerical and administrative.

s: confidentiality statement 2004
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