

RE-LINK CLIENT CONFIDENTIALITY PLAN

BCFS Health and Human Services (BCFS HHS) and all network partners and service providers below and in subsequent plan pages are committed to keeping client information confidential. This RE-LINK Client Confidentiality Plan covers the entire five year project period, includes all network partners, and is signed by authorized representatives from each organization. The plan was developed collectively among project partners with a consistent process across network partners. BCFS HHS and network partners employ a comprehensive, multi-level system to ensure the protection of confidential information. This includes training all staff to respect and protect client confidentiality. As an initial part of employee orientation and/or onboarding, each staff member receives training on confidentiality and signs a confidentiality agreement which describes the importance of confidentiality of client relationships, communication, files, and confidentiality as it relates to the use of technology. Confidentiality is also addressed on an ongoing, as-needed basis during staff meetings and training at all levels and is integral to organizational culture at BCFS HHS and all partners. All hard copies of client information, staff personnel records, financial and medical files are maintained in locked file cabinets. Information is restricted to staff on a “need to know” basis and privacy is strictly protected. Staff, to the best of their ability, ensures confidentiality and privacy in regard to history, records, and discussions about the people served. Staff does not disclose any information about a client, including the fact that he or she is or is not served by BCFS HHS or partners, to anyone outside the organization unless otherwise authorized by the client in writing. BCFS HHS and partners all utilize secure, password-protected database systems/client tracking tools/medical record portals, restricting access to client files so that only staff working directly with clients (and program supervisory staff) can view and/or add to their records. BCFS HHS and all partners follow state and federal requirements regarding retention and disposition of confidential records. BCFS HHS and partner organizations will share participant data and statistics within the confines of the law governing confidentiality requirements. The proposed integrated healthcare and social services project will comply with all state and federal policies and procedures for consumer privacy and security of treatment records. BCFS HHS and all network partners, including partnering healthcare organizations, are fully compliant with HIPAA requirements regarding privacy and security, including collection, storage, and use of consumer-identifying information.

Name, Title	Date
Partner Organization	

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