



PATHWAYS COUNSELING CENTER, INC.

HIPAA

Confidentiality of Client Information

Policy

Pathways Counseling Center, Inc. shall insure the privacy of all clients at all sites.

Procedure

1. Pathways Counseling Center, Inc. shall inform all clients of the Notice of Privacy Practices and make available upon request to all individuals as specified in this policy.
2. Pathways Counseling Center, Inc. shall retain copies of the notices. Pathways Counseling Center, Inc. issues, including the original and subsequent revisions. Copies may be printed or electronic, and shall be retained for at least six years from the date the notice was created or was last in effect, whichever is later.
3. Pathways Counseling Center, Inc. shall not use or disclose protected health information in a manner inconsistent with Pathways Counseling Center, Inc.'s Notice of Privacy Practices or those practices described in Pathways Counseling Center, Inc.'s HIPAA Policies and Procedures Addendum.
4. Pathways Counseling Center, Inc. shall promptly revise and distribute the Notice whenever there is a material change in a privacy practice as stated in the Notice. This could include a change to uses or disclosures, the individual's rights, Pathways Counseling Center, Inc.'s legal duties, or other privacy practices.
5. Revisions to the Notice shall not be implemented prior to the effective date of the revised notice, except as required by law.
6. Pathways Counseling Center, Inc. shall make the Notice available on request to any person all individuals as specified in this policy.
7. Pathways Counseling Center, Inc. shall provide the notice to clients:
 - a. No later than the date of first service delivery, including services delivered electronically;
 - b. If the individual is a client prior to the compliance date of the HIPAA regulations, no later than the date of first service delivery after the compliance date;
 - c. In an emergency treatment situation, as soon as reasonably practicable after the emergency treatment situation.
8. Pathways Counseling Center, Inc. shall make a good faith effort to obtain written acknowledgment of receipt of the Notice. If not obtained, Pathways Counseling Center, Inc. shall document his/her good faith efforts to obtain written acknowledgment and the reason why it was not obtained.
9. In an emergency treatment situation Pathways Counseling Center, Inc. is not required to obtain written acknowledgment of receipt of the Notice.
10. Pathways Counseling Center, Inc. shall post the notice in a clear and prominent location where individuals seeking services can reasonably read the Notice.
11. Whenever the Notice is revised, the revised Notice shall be made available and posted as described in this policy.