



## Easter Seals Iowa Privacy Practice

Also See: Protected Health Information  
Notice of Privacy Practice  
Record Keeping

**Purpose:** Easter Seals Iowa is committed to treating clients with dignity and respect. Easter Seals is committed to ensuring that clients receive the privacy that they deserve and that is mandated by state and federal law. The Notice of Privacy Practice outlines how and when protected health information can be shared; the responsibility of team members; and client rights. This policy outlines the expectation that Easter Seals team members conduct business following the mandates of the Notice of Privacy Practice.

**Policy:** All Easter Seals team members must conduct business in accordance with the procedures spelled out in Notice of Privacy Practice. The notice states how the agency will disclose protected health information for purposes of treatment, payment, and health care operations. Releasing protected health information for any reason other than those stated above requires a written authorization; unless otherwise stated by law and/or in the Notice of Privacy Practice.

Effective April 14, 2003, the Notice of Privacy Practice must be posted in each operating location, and on the Easter Seals web site. Copies of the notice must be distributed to clients for review and authorization; additional copies must also be available for clients, and/or their legal guardians at their request.

Easter Seals Iowa reserves the right to revise the Notice of Privacy Practice, if there is a material change to any of the privacy practices stated in the notice the agency will redistribute the notice. Except when required by law, a material change to any term of the notice may not be implemented prior to the effective date of the notice in which the change is reflected.

As stated in the Notice of Privacy Practice clients and/or their legal guardian have the right to file a complaint, either internally or externally in the event they believe their privacy rights have been violated. Easter Seals Iowa will not tolerate any team member retaliating against a client or legal guardian for filing a complaint. Violation of this could result in termination.

**Procedure:** Clients entering Easter Seals programs on or after April 14, 2003 shall receive the Notice of Privacy Practice at the time of their intake; or with confirmation of services to be received.

The Notice of Privacy Practice must be given and explained to each client served in Easter Seals programs. Alternative formats of this document (i.e. - Braille, large print, language translation) will be made available upon request. The Intake Coordinator or designated team member will be responsible for giving an overview of the document to the client and/or their legal guardian; the client and/or guardian should have the opportunity to read the document and ask questions. Once this opportunity occurs, the client and/or guardian should sign the document, which indicates they have read; understand and have been given the opportunity to ask questions.

Those clients utilizing multiple programs will only need one Notice of Privacy Practice. It will be the program's responsibility in the following order to orient and obtain client and/or their guardian's authorization: Case Management, AIM, Supported Community Living, Vocational, Adult Day, Respite, Rural Solutions, AT Center, Child Development Center, and Camping & Recreation.

The signature page of the Notice of Privacy Practices should be maintained in the client file under the Release of Information section, as well as indicating the form has been signed via the Consumer Information Form on the client database.

Failure to follow any part of this policy or procedure could result in disciplinary action up to and including termination.

**Owner:** Chief Compliance Officer

**Approved:** 3/03

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**Next Review Date:** 1/19