



Target Community & Educational Services, Inc.

...Targeting Dreams, Fostering Opportunities

Health Information Portability and Accountability Act (HIPAA)

In order to comply with HIPAA's privacy provisions, Target has established the following policies and procedures to ensure an individual's privacy concerning health care information.

I. Privacy Officer

Jessica Dixon, Vice President of Programs and Quality Assurance

II. Protected Health Information (PHI)

Protected health information (PHI) is any information about health status, provision of health care, or payment for health care that can be linked to a specific individual. This may include any part of a client's medical record or payment history. PHI includes information of persons living or deceased.

III. Notice of Privacy Practices

- A. Target Community & Educational Services, Inc. (Target) is committed to protecting the privacy of clients' PHI. In order to provide treatment, assist with paying for health care, or for other purposes listed below, Target may require certain health information to be added to a client's record. The record may contain symptoms, diagnoses, examination and health results, treatment, Individual Plans, and Behavior Management information.
- B. We are required by HIPAA and other applicable laws to maintain the privacy of health information, to provide individuals with the Notice of Privacy Practices of our legal duties and privacy practices with respect to such information, and to abide by the terms of the Notice. We are also required by law to notify affected individuals following a breach of their unsecured health information. We reserve the right to change the terms of the Notice of Privacy Practices as necessary and to make the new Notice effective for all health information that we maintain. A copy of the new Notice may be requested at any time from the Vice President of Programs and Quality Assurance, 111 Stoner Avenue, Westminster, MD 21157 or by calling 410-848-9090.

IV. Uses and Disclosures

Target uses or discloses PHI for the purposes of treatment, payment, and health care operations, or when required to do so by law or regulation.

A. Client Authorization

Except as outlined below, we will not use or reveal PHI for any purpose unless the individual has signed a form authorizing the use or disclosure. The individual has the right to revoke that consent or authorization in writing unless we have taken any action in reliance on the consent or authorization.

B. For Treatment

Target shares PHI with all members of the interdisciplinary team and medical services providers. We share PHI with other providers identified in the Individual Plan (IP).

C. For Payment

Target shares PHI with organizations that provide payment for services that the individuals receive, including insurance companies and state and county government. We will disclose PHI as necessary so that health professionals and facilities that have treated or provided services for the individual may receive payment.

D. Health Care Operations

Target will disclose PHI as necessary, and as permitted by law, for our health care operations. We may share PHI with state and county regulatory bodies and accrediting agencies. We will also share PHI with Dimensional Healthcare and other healthcare professionals, as needed, to provide individuals with the highest quality of care. We may use and disclose PHI to help us improve the individual's treatment and care.

E. Regulation and Law Enforcement

Target may use and disclose PHI with public health agencies, courts, legal counsel to the agency, law enforcement agencies, the Maryland Disability Law Center, medical examiners, and state, county, and federal government agencies.

1. To report information related to victims of abuse, neglect, or domestic violence;
2. To assist law enforcement officials in their law enforcement duties; or
3. To assist public health, safety, or law enforcement officials avert a serious threat to the health or safety of you or any other person.

F. Electronic Disclosures

We may use and disclose PHI electronically for various purposes, such as treatment, payment, health care operations, and other purposes permitted or required by law. If we need to disclose PHI electronically for other purposes, we will obtain the individual's authorization in writing. We will protect all PHI that is electronically sent to anyone outside of the agency or the family/guardian/team members by encrypting it with a password. All staff are required to follow our Social Media Policy.

G. Individuals' Rights

1. They have the right to request access to their files.
2. They have the right to request an amendment to their files.
3. They have the right to know with whom their PHI is being shared. They also have the right to request a restriction or limitation on the disclosure of their PHI.
4. They have the right to confidentiality of their records and communications.
5. They have the right to file a complaint if they believe their privacy rights have been violated. They may file this complaint with the Quality Enhancement department. We support their right to protect your PHI.
6. They have the right to review a detailed copy of Target's Notice of Privacy Practices. The Notice of Privacy Practices is maintained on Target's website.

H. Training

Individuals have the right to have their PHI treated confidentially by all of the employees and business associates of the agency. Therefore, all employees of Target will receive the agency's Notice of Privacy Practices and will be trained on HIPAA regulations and Target's privacy policies. Target employees will be required to sign a form stating that they received a copy of Target's Notice of Privacy Practices, received training on HIPAA and the agency's privacy policies, and understand that they are required to comply with these regulations and policies. Employee training will include confidentiality and disclosure requirements of the law, specific requirements regarding electronic transmission of PHI, and all other aspects of the new HIPAA regulations.

V. **Privacy Questions and Complaints**

Any questions or complaints relating to privacy should be directed towards Target's Vice President of Programs and Quality Assurance at the Carroll County Main Office, located at 111 Stoner Avenue, Westminster, MD 21157, or by phone at 410-848-9090.