

Section 57a

Notice of Privacy Practices; Confidentiality Policy

Policy: In order to fulfill PACE @ Home's mission, the program recognizes that participants expect and deserve that the exchange of all information pertaining to them be strictly limited to only those team members who need to know that information. PACE @ Home considers a breach of confidentiality to be a serious event and considers any inappropriate disclosure of participant or business information a violation of trust that jeopardizes the mission and survival of the program. Each participant has the right to communicate with his/her health care provider in confidence and to have the confidentiality of his/her health care information protected. The following procedures govern the exchange of information between team members, contractors, and participants and their caregivers.

Procedure:

1. Those associated with PACE @ Home, including contractors, participants and their caregivers, shall not seek, use, nor disseminate information for which they do not have a need or right to know.
2. Staff who have access to participant and business information must protect and utilize this information with the greatest level of care and will comply with PACE @ Home's policy for release of information. Failure to protect confidential information will result in disciplinary action.
3. Staff who do not need access to participant or business information, but gain access willfully, and as a result, breach either the integrity of participant or the business operation of the program, will be disciplined up to and including termination of employment.
4. Those who gain access to participant information inadvertently, either within the program or outside of it, have a responsibility to protect the confidentiality of the participant and business information and to take action to stop further dissemination of confidential information.
5. The degree to which the integrity of this policy was breached by a staff member will determine the level of discipline. Supervisors are to refer to PACE @ Home's policy on corrective action.
6. Statements of confidentiality, which will be provided and acknowledged by all those associated with PACE @ Home, are attached. These statements are reviewed yearly at time hire and during annual appraisals.
7. At no time, will staff release participant health care information without the written

consent of said participant. Participants and/or designated representatives may provide written consent that limits the degree of information and the persons to whom information may be given.

8. Confidentiality must also be maintained during any grievance or appeal process.
9. Contractors, as well as, participants and their caregivers are expected to live up to the same standard set for PACE @ Home employees. Breaches in confidentiality by contractors will be subject to review and termination. Participants and his/her caregiver will be counseled and subject to disenrollment in instances where rights have been seriously violated.

Attachment: