

**Cottonwood, Inc.  
Policies and Procedures**

**SECTION:** Consumer Related

**POLICY NO:** 05-028

**SUBJECT:** Confidentiality of Consumer Documents

**PAGE(S):** 1 of 2

**EFFECTIVE DATE:** April 1988

**Licensing Regulation  
Reference:** 30-63-29

**Policy:**

Any verbal, written or electronically stored information regarding an individual served by Cottonwood, Inc. shall be considered confidential. The individual's right to confidentiality of information shall be respected by staff at all times, even when staff is off duty.

This policy outlines how Cottonwood, Inc. secures case records, fax machines, trash, etc. For detailed information about protected health information please see the HIPAA Privacy Policy 05-048.

**Procedures:**

1. Access to case records shall be limited to the person served and their support team, CEO, administrators, department directors, case managers and the staff person who is responsible for filing. Any other person desiring access to a case record must be authorized by the Support Service Director, Case Manager or Records Management Specialist. Viewing records will be governed by the rules of confidentiality.
2. In general, all case records must be reviewed in the file room which is kept locked in Building I. Any staff needing something copied from the file must seek assistance from Support Services staff. Case managers may have the records in their offices for short work periods. All records must be returned to the file room daily.
3. The case records can only be removed from the Cottonwood, Inc. facilities for purposes authorized by the Director of Support Services.
4. A Release of Information signed by the Consumer or guardian, if applicable, is required prior to the release of information to another person or agency unless the request is from another covered entity. The information requested must be specified and pertinent to the person or agency's needs.
5. Information generated by another agency or third party will not be released to anyone other than Cottonwood, Inc. staff, the consumer, or his/her guardian, except for transfer of discharged records with appropriate consent.
6. All trash that contains protected health information must be shredded. Sensitive information should be shredded immediately.

7. Any protected or confidential information that is being transported in a vehicle will be kept secure through agreed upon departmental guidelines (i.e., pouches, file folders, etc.)
8. All faxes are to be received and delivered in a secure area, and/or secure fax software.
9. The Executive Assistant and Health Support staff shall periodically check all received faxes from the fax machines and deliver the fax to the intended recipient or place in his/her mailbox. For the time periods in between, staff should place incoming faxes face down in the adjoining tray.
10. All faxes being sent must have a fully completed Cottonwood, Inc. cover sheet. The fax number to which the material is being faxed shall be double checked before being sent. All staff receiving faxes should request that senders use a coversheet to enable accurate delivery.