

Department of Speech, Language, and Hearing Sciences
Norma S. and Ray R. Rees Speech, Language, Hearing Clinic
California State University East Bay

Policy Statement

CONFIDENTIALITY

The clinic follows HIPAA regulations for privacy of PHI (Protected Health Information), and requires that client data must receive confidential treatment. It is the department's policy that all client data should only be accessed by those given express permission, which may include supervisors, instructors, clinicians, or other authorized individuals. Student violations may result in disciplinary action leading to dismissal from the department and/or expulsion from the CSU System per Executive Order 1098–Student Conduct Procedures.

In our setting, PHI typically may include

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- Full name
- Telephone numbers
- E-mail addresses
- Medical record numbers and/or offsite clinic file numbers
- Health plan beneficiary numbers and other identifying information
- Geographic subdivision smaller than a state including street address, city, county, precinct, zip code
- Any and all dates (except the year), including birth date, and application for services date

- 1) Do not remove physical client files from the building
 - a. When transporting files outside of the main clinic to other locations within the building, place them in an “intercampus” envelope
- 2) Store client files in a secure area when not in use, including overnight
- 3) Turn client files face down when using in an area where others are present
- 4) De-identify working files
- 5) Secure test protocols immediately after evaluation session
- 6) Do not take pictures of any client data
- 7) Only retrieve “Pioneer Print” client data from the machine in the student workroom
- 8) Shred client data as appropriate
- 9) Do not send client data by email unless it is de-identified or password protected
- 10) Do not store any client electronic PHI in a non-password protected environment
- 11) Do not access any client data not assigned to you

The same safeguards for protection of written client data must also be applied to data shared verbally, visually, and electronically. Do not discuss client data where others can hear, and only with those authorized to participate in discussions. Rees Clinic video recordings of clinical sessions must be accessed using clinic computers only. Recording of clients is prohibited, including during telepractice or with separate devices such as cell phones.

Client PHI may not be used as teaching tools or direct sources for writing reports, planning treatment goals, or designing therapy tasks without express written permission by client/s. If appropriate, supervisors or faculty may provide anonymous or archival client data to assist clinicians in these areas.

Graduate clinicians are required to have completed a HIPAA training module before beginning clinical practicum activities. For activities that include both client and clinician data, HIPAA and FERPA may both apply. If relevant, graduate clinicians are required to have also completed a FERPA training module.