

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

CONFIDENTIALITY POLICY

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:

- 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) Turn client identified documents face down when using in an area where others are present
 - a. De-identify all working files
 - b. Secure test protocols immediately after evaluation session
- 2) Do not take pictures of any client data/documentation
- 3) Shred client data/documents as appropriate
- 4) Do not send client data/documents by email unless it is de-identified or password protected
- 5) Do not store any client electronic PHI in a non-password protected environment
- 6) Accessing client data/documents not assigned to you is prohibited

The same safeguards for protection of written client data must also be applied to data shared verbally, visually, and electronically. Do not discuss client information 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. Audio recording of a session on a personal device is permitted, however, it must be explained that the recording is for data collection purposes only and will be deleted immediately after review. The client or family must give verbal consent, which can be revoked, and is then documented in the SOAP note. Recording telepractice sessions are not permitted.

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. 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.