



HIPPA COMPLIANCE POLICY

Reviewed: October 21, 2024



OCTOBER 21, 2024

PATHWAYS BIBLICAL COUNSELING CENTER
119 Habitat St, Americus, GA 31709

Pathways Biblical Counseling Center: HIPAA Compliance Policy

1. Purpose The purpose of this policy is to ensure that Pathways Biblical Counseling Center complies with the Health Insurance Portability and Accountability Act (HIPAA), which mandates the protection and confidential handling of an individual's health information. This policy outlines the center's commitment to safeguarding Protected Health Information (PHI) in both physical and electronic formats, in accordance with federal regulations (Proverbs 11:13).

2. Scope This policy applies to all employees, counselors, contractors, and volunteers who have access to or handle client health information at Pathways Biblical Counseling Center. It governs the collection, use, storage, and disclosure of PHI, ensuring the confidentiality, integrity, and availability of this sensitive information.

3. Definition of Protected Health Information (PHI) Protected Health Information (PHI) includes any identifiable health-related information that is created, received, stored, or transmitted by Pathways Biblical Counseling Center. This information can relate to:

- The client's past, present, or future physical or mental health.
- The provision of counseling or other health services to the client.
- Payment for health care services.

Examples of PHI include, but are not limited to, client names, contact information, health records, treatment plans, billing information, and any identifying details connected to health services.

4. Client Rights Under HIPAA

Pathways Biblical Counseling Center recognizes and respects the rights of clients to:

- **Access Their Health Information:** Clients have the right to access and obtain a copy of their health records upon written request. The center will provide access to these records within 30 days, or as required by law.
- **Request Amendments:** Clients have the right to request changes to their health information if they believe it is inaccurate or incomplete. The center will review such requests and, if applicable, make the necessary amendments.
- **Confidential Communications:** Clients have the right to request that communication about their health information be conducted in a confidential manner or through specific means (e.g., via email or phone).
- **Restrictions on Disclosures:** Clients have the right to request restrictions on how their health information is used or disclosed. While the center will consider such requests, it may not be able to comply with all restrictions based on legal or operational needs.
- **Right to Complain:** Clients have the right to file a complaint if they believe their privacy rights have been violated. Complaints can be directed to the center's Privacy Officer or to the U.S. Department of Health and Human Services (HHS) Office for Civil Rights.

5. Use and Disclosure of PHI

Pathways Biblical Counseling Center uses and discloses PHI only as necessary for the following purposes:

- **Treatment:** PHI may be used or shared among counselors and health professionals involved in the client's care, in order to coordinate treatment, plan services, and improve health outcomes (e.g., sharing information between a counselor and a medical doctor with the client's consent).
- **Payment:** PHI may be used to process payments for services provided to clients, including billing clients directly or communicating with insurance companies or third-party payers as authorized by the client.
- **Health Care Operations:** PHI may be used for internal administrative purposes, such as staff training, quality assurance, or business planning.
- **Required by Law:** Pathways Biblical Counseling Center will disclose PHI when required by law, such as in cases of mandatory reporting of abuse or neglect, court orders, or public health requirements.
- **With Client Consent:** PHI may be shared with third parties, such as family members or other care providers, only with the client's written consent, except in cases of legal or ethical obligations.

6. Minimum Necessary Rule

The center adheres to the "Minimum Necessary Rule" under HIPAA, meaning that when using or disclosing PHI, only the minimum amount of information necessary to accomplish the intended purpose will be shared. Staff must limit access to PHI to those who need it to perform their job functions, and only the information necessary for that task will be disclosed.

7. Safeguarding PHI

Pathways Biblical Counseling Center is committed to safeguarding PHI through the following security measures:

A. Physical Security

- **Restricted Access:** PHI in paper format will be stored in locked file cabinets or rooms with restricted access. Only authorized personnel will have access to physical records.
- **Document Disposal:** Paper records containing PHI that are no longer needed will be securely shredded or otherwise destroyed to prevent unauthorized access.

B. Electronic Security

- **Password Protection:** Electronic systems containing PHI will be protected by secure, password-protected accounts. Passwords must be strong, changed regularly, and not shared among staff.

- **Encryption:** PHI stored electronically or transmitted via email or other digital means will be encrypted to protect against unauthorized access.
- **Backup and Recovery:** Electronic PHI will be regularly backed up to ensure its availability in the event of system failures. Backup systems must also be encrypted and stored securely.
- **Monitoring and Access Controls:** The center's electronic systems will be monitored for unauthorized access, and access controls will be implemented to limit which staff members can view, modify, or delete PHI.

C. Training and Awareness

- **Staff Training:** All employees, contractors, and volunteers will receive training on HIPAA regulations, privacy practices, and the center's security procedures. Training will be conducted during onboarding and refreshed annually.
- **Confidentiality Agreements:** All staff must sign confidentiality agreements as part of their employment, acknowledging their understanding of the center's commitment to protecting PHI.

8. Breach Notification

In the event of a breach involving PHI, Pathways Biblical Counseling Center will:

- **Identify the Breach:** Immediately assess the nature and scope of the breach to determine the extent of the unauthorized disclosure of PHI.
- **Notify Affected Clients:** Notify affected clients in writing within 60 days of discovering the breach, providing details of the breach, what information was involved, and the steps being taken to mitigate the impact.
- **Report to Authorities:** If the breach involves more than 500 individuals or meets certain criteria, the center will report the breach to the U.S. Department of Health and Human Services (HHS) and may notify the media, as required by law.

9. Client Consent and Authorization

Pathways Biblical Counseling Center requires clients to sign an **Authorization for Release of Information** before any PHI is disclosed to third parties, except when disclosure is legally required or falls under standard operations such as treatment or payment.

- **Revocation of Consent:** Clients may revoke their consent for the use or disclosure of their PHI at any time in writing. Upon receiving the revocation, the center will cease using or disclosing the client's PHI, except as required by law.

10. Privacy Officer and Contact Information

The center will designate a **Privacy Officer** who is responsible for overseeing HIPAA compliance, handling client inquiries, and investigating any potential breaches of PHI.

Privacy Officer Contact Information:

Matthew Almeida
(229) 514-0845 Ext. 1001

11. Violations and Disciplinary Actions

Failure to comply with this policy or HIPAA regulations may result in disciplinary actions, up to and including termination of employment. Serious violations, including breaches of client confidentiality, may result in legal consequences.

12. Policy Review and Updates

This HIPAA Compliance Policy will be reviewed regularly to ensure that it complies with current regulations and best practices. Any updates or changes to the policy will be communicated to all staff and volunteers (Proverbs 15:22).