

Confidentiality & Privacy Requirements

Policy: All West Slope Casa providers will adhere strictly to federal confidentiality law 42 CFR Part 2. All West Slope Casa providers will implement the HIPAA rules and develop policies and procedures for such.

Procedures:

1. 42 CFR Part 2 and HIPAA will be fully implemented into programs by April 16, 2003.
2. HIPAA policies and procedure templates can be accessed through West Slope Casa by e-mailing sroberts@cwrnhc.org
3. Programs will sign a Business Associate Addendum with each fiscal year contract between the program and WSC.
4. Programs will sign a Confidentiality Agreement for Audit and Evaluation Activities with WSC with each fiscal year, beginning FY04.
5. West Slope Casa will sign a Confidentiality Agreement for Audit and Evaluation Activities with the Colorado Alcohol and Drug Abuse Division.
6. All West Slope Casa programs will sign a Qualified Service Organization Agreement with West Slope Casa LLC, which will remain in effect until the program(s) is/are no longer a part of the West Slope Casa network.
 - a. Providers may share client-identifying information with West Slope Casa managing partners and employees, without a signed release by the client.
 - b. Any client-identifying information shared between programs in the West Slope Casa network requires a signed release by the client.
7. All clients receiving substance abuse services, regardless of payor source, must be DACOD'ed for audit and evaluation purposes by the State of Colorado.