

Wings Support & Recovery	Policy Section: 5 - Personnel Policy Number: 2.10.2
Subject: Records Privacy Policy Original Adoption Date: 5/1/17 Latest Board Approved Revision: 02/27/2025	Revision Date(s): 6/18/2020 07/27/2023 02/27/2025

Policy: Wings is committed to protecting the privacy of staff and clients and ensuring that personal information is handled in a safe and responsible manner. Employees, applicants for employment and client's past criminal record, history of any medical conditions including alcohol or drug use history or HIV disease, and any other sensitive information shall be kept confidential. Such information shall only be disclosed to those who need to know about necessary work restrictions and accommodations or to arrange emergency medical care, and shall not be disclosed to parties outside Wings Support & Recovery except when necessary and when permitted or required by law.

Procedure:

1. The confidentiality of alcohol and drug abuse records all employees and participants shall be maintained in accordance with 42 C.F.R. part 2, confidentiality of alcohol and drug abuse records requirements.
 - a. Program staff shall not convey to a person outside of the program that a client receives services from the program or disclose any information identifying a client as an alcohol or other drug services client unless the client consents in writing for the release of information, the disclosure is allowed by a court order, or the disclosure is made to qualified personnel for a medical emergency, research, audit or program evaluation purposes.
Federal laws and regulations do not protect any threat to commit a crime, any information about a crime committed by a client either at the program or against any person who works for the program.
 - b. Federal laws and regulations do not protect any information about suspected child abuse or neglect from being reported under State law to appropriate State or Local authorities.
2. All information released will include the following prohibition on the disclosure:
 - a. This information has been disclosed to you from records protected by Federal confidentiality rules (42 CFR part 2). The Federal rules prohibit you from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted by 42 CFR part 2. A general authorization for the release of medical

or other information is NOT sufficient for this purpose. The Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patient

3. Any time protected health information is disclosed the following information will be documented in the client record:
 - a. Client name and signature
 - b. Name and address of the recipient
 - c. Manner of disclosure (mail, fax, verbal etc.)
 - d. Date of disclosure & date of expiration
 - e. Brief description of protected health information disclosed
 - f. Brief purpose of the disclosure (treatment coordination etc.)
 - g. Information as to how and when the authorization can be revoked
 - h. All protected health information sent or received will be tracked using the PHI tracking option in the client's electronic health record
4. Wings Support & Recovery is committed to protecting the privacy, security, confidentiality, integrity and availability of individually identifiable protected health information in compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the regulations described therein. These policies and procedures apply to protected health information (PHI) created, acquired, maintained or disclosed by Wings Support & Recovery employees, subcontractors, Business Associates, vendors, volunteers and interns. All individuals representing Wings Support & Recovery will take responsibility for safeguarding protected health information to which they have access. HHS published a final Privacy Rule in December 2000, which was later modified in August 2002. Compliance with the Privacy Rule was required as of April 14, 2003 (April 14, 2004, for small health plans). HHS published a final Security Rule in February 2003. This Rule sets national standards for protecting the confidentiality, integrity, and availability of electronic protected health information. Compliance with the Security Rule was required as of April 20, 2005 (April 20, 2006 for small health plans).
5. Wings Support & Recovery will provide annual HIPAA training for employees and volunteers.
6. Wings utilizes Short Messaging Service (SMS/text) communication as necessary to reach consumers.
 - a. Information collected:
 - i. **Mobile phone number:** We collect your phone number to send messages
 - ii. **Message content:** We may collect and store the content of SMS messages that you send or receive as a part of the communication process.
 - iii. **Usage information:** We may collect non-personal information such as the date and time of messages, message delivery and read status, and interaction data (such as responses to messages).
 - b. We may use information we collect to:

- i. Send informational messages related to the services you receive
 - ii. Communicate regarding upcoming or past scheduled appointments
 - iii. Comply with legal obligations and enforce our terms and conditions
- c. Sharing information:
 - i. We do not sell, rent, or share any phone number with third parties for their own marketing purposes. We may share information with services providers or partners who assist in sending SMS messages or providing other services who are required to handle information in accordance with this Privacy Policy.
- d. Opting out:
 - i. Individuals have the right to opt out of receiving SMS messaging at any time. To stop receiving messages, reply "STOP" or follow opt-out instructions in the SMS message. No further SMS will be sent after opting out.