

The following is a complete list of direct staffers who are authorized to access files on a limited basis in order to fulfill their day-to-day responsibilities: Caroline Brabazon-Wilkinson, Director; and Laurie Brabazon, Office Administration.

As a general policy, the individual therapist assigned to work with a particular child is deemed authorized personnel for that child's file only through the date of discharge unless circumstances change. All personnel are expected to adhere to confidentiality requirements and return appropriate files to Bridges to Bright Futures at the time of a child's discharge from the early intervention program.

Transport of Records

Providers may have materials related to several children's early intervention program in their possession while traveling to home visits. All files must be transported in a secure, locked, fireproof portable file container at all times. The container must be clearly labeled CONFIDENTIAL – Limited Access. Only files or materials related to the specific child may be carried into that child's residence for an on-site visit. All other children's files must be secured in a locked, fireproof file in the vehicle's trunk, with no exceptions.

Chapter 2 PROCEDURES SUMMARY

Procedure 2.1:	Follow all confidentiality laws and regulations regarding access to personally identifiable information, including but not limited to FERPA, IDEA and NYS Early Intervention.
Procedure 2.2:	Never release or discuss any information about the children and families receiving early intervention services.
Procedure 2.3:	Never release any information or documentation relating to a child without parental or legal guardian permission (See <i>Parental Consent-Records</i> and <i>Authorization for Release of Confidential HIV-related Information</i> forms).
Procedure 2.4:	Sensitive information, including information about sexual or physical abuse, treatment for mental illness or mental health issues, HIV status; communicable disease status, child's parentage may not be disclosed without express written consent.
Procedure 2.5:	Do not include any reference to a child's HIV-status in an early intervention record. If a reference is included in the record, a separate <i>Authorization for Release of Confidential HIV-related Information</i> form signed by the parent/guardian must be completed.
Procedure 2.6:	Maintain a child access log for every child in the EI program (see <i>Child Access Log</i> form).
Procedure 2.7:	Photocopying of records may only be performed in the East Patchogue, NY location or from a secure home office location.
Procedure 2.8:	Faxing any personally identifiable information requires access to a private fax machine (no retail/library) in a secure location, a cover sheet with confidentiality disclaimer (see sample) and a pre-fax phone call to alert recipient of incoming fax.
Procedure 2.9:	Do not e-mail any documents relating to a child in the EIP without completing the <i>Parental Consent to Use E-mail to Exchange Personally Identifiable Information</i> .
Procedure 2.10:	Follow guidelines for computer security and usage, including purchasing an USB flash drive, creating separate user accounts and making folders private.
Procedure 2.11:	Maintain individual files for each child with the words CONFIDENTIAL – Limited Access clearly noted and a child access log, to be locked in a secure, fireproof file cabinet with CONFIDENTIAL – Limited Access noted on the storage.
Procedure 2.12:	Return a child's files and complete records to Bridges to Bright Futures at the time of discharge.
Procedure 2.13:	Transport of files while in the field requires a locked, fireproof container to be stored in the trunk of the vehicle.
Procedure 2.14:	Bring only the relevant child's file into the home, and all other files must be locked in the trunk of the vehicle in the secure, fireproof container.