Policy:	**CONFIDENTIALITY & PRIVACY (Statement & Information)**	
Issued:	Date of original: 8/2011	Date of revision: 6/2013, 9/2013, 1/2016, 6/2018, 12/2019, 6/2021, 4/2022, 5/2024
Approval:	Title: Associate Vice President, Student Health, Counseling and Wellness	

PURPOSE: **To ensure that Student Health and Counseling Center staff and students affiliated with Student Health Services understand confidentiality statements, violation, and disclosure parameters of confidential information.**

DEFINITION: The "Confidentiality Statement" is a document used for the safe keeping of data and information as restricted to individuals who have a need, reason, and permission for access to it. This document is used to protect information and privacy.

POLICY: All information about a student, patient, client, or employee is considered confidential and is to be released only to authorized personnel.

PROCEDURE: Information about patients/students:

1. Requests to verify whether or not a patient has been, is being or is expected to be seen at the Student Health and Counseling Center will result in the caller being informed that this information is confidential and cannot be released.
2. If the individual is insistent or gives the staff member information indicating special knowledge, the individual should be referred to the clinic for an assessment of circumstances.
3. All employees of the SHCC will abide by the HIPAA Privacy Rule. Ethically, and legally, a patient's chart should not be opened/entered/accessed, by anyone that is not directly involved in the patients care, or who has not been given written authorization, specifics within, and signed by the patient. If a SHCC patient does complete documentation for anyone, including an employee of the SHCC, to have access to their chart, the request will, first, be reviewed by the Director of Medical Services and or the Director of CAPS, ensuring state and federal compliance with disclosure.
4. **Any telephone calls or direct contact from an attorney or attorney's office regarding a patient must be referred to the Associate Vice President's office.**

Requests from law enforcement officers or public health departments for information

concerning a patient:

5. Student Health and Counseling Center staff will comply with the California Health & Safety Code 3215 and the California Administrative Code, Title 17, Public Health 2500, concerning reportable diseases and conditions.
6. In the event of a medical emergency involving a student on campus, a Campus Police officer may request medical/counseling information from Student Health and Counseling Center medical/counseling records. Such requests are to be referred to the Coordinator of Medical Services, Director of CAPS or designee. Compliance with such a request is in accordance with the Family Education Rights and Privacy Act of 1974 § IIA, #5 (FERPA), Confidentiality of Substance Abuse Disorder Patient Records (42 CFR Part 2), and the Health Insurance Portability and Accountability Act of 1996 (HIPAA).
7. If a situation arises whereby Campus Police or other law enforcement officers need non-medical information such as address and phone number of a patient or a patient's parents/guardian, the information may be released. Calls for such information should be referred to the Associate Vice President for Student Health, Counseling and Wellness' office.

Public Address System Announcements:

8. If a personal item is lost or found, a non-identifying statement will be made over the public address system (e.g., "A wallet has been found, please come to the front desk").
9. In the event that a provider or other staff member feel it is urgent to request a patient to return to a particular clinic or department, the patient's name will be used when paging.

Confidentiality Statements:

10. Student Assistants, Student Interns, Externs, Trainees or Student Volunteers are required to sign a confidentiality statement prior to beginning work or active involvement in SHCC programs or departments.
11. Confidentiality statements for Student Interns, Externs, Trainees and Student Volunteers are filed with the Health Services Assistant.

Violation of Confidentiality:

12. Any complaint of a violation of confidentiality will be investigated by the Executive Director or his/her designee.
13. Any confirmed violation of confidentiality by a SHCC employee will result in disciplinary action in accordance with University regulations, and the appropriate Staff Memorandum of Understanding.
14. Confirmed violation of confidentiality by a Student Assistant, Intern, Extern, Trainees or volunteer will result in termination from their position, and may result in disciplinary action by the University.

REFERENCES: Board of Trustees Security Policy and CSU HIPAA Privacy Policy