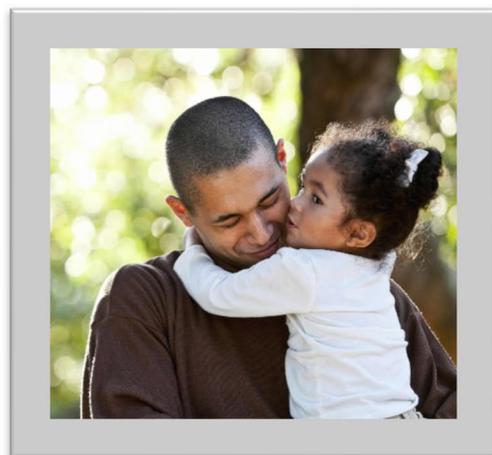




Idaho WIC Training

Confidentiality



IDAHO DEPARTMENT OF
HEALTH & WELFARE
DIVISION OF PUBLIC HEALTH

WIC is an equal opportunity provider.

What Will You Learn?

The Idaho WIC program must ensure the protection of personal information of all applicants and participants. The WIC program has specific policies and procedures to maintain confidentiality. In the following module, you will learn ways to protect personal information of WIC applicants and participants.

Instruction Level

Prerequisite: WIC Overview

Items Needed for This Course

Access to the Idaho WIC website for the following resources:

- Policy Manual - Definitions and acronyms
- Forms - Confidentiality Agreement
- No video for this guidebook

References

- Information adapted from Loving Support© Through Peer Counseling: A Journey Together
- Agency Health Insurance Portability Accountability Act (HIPAA) policy

Recommended Time

- Approximate time it takes to complete the Confidentiality course: 1-2 hours
- Approximate time it takes to complete the activities and discussion: 1-2 hours

Module 1: Confidentiality

Confidentiality

There are many situations that might make it difficult to keep a participant's personal information confidential. For example, the desire to share experiences you have had with others or running into a participant in the community. Staff and volunteers are to follow the Idaho WIC Policy and their agency's policies on confidentiality.



Complete Activity 1 in your Activities Workbook

Some things to keep in mind about confidentiality:

- Participant information must not be released without a signed release of information. This includes telephone requests. Do not share anything about WIC participants, even the fact they are on WIC, with anyone. You can share information with other WIC staff or your supervisor if the information is important to get the participant the help they need or to increase your knowledge and skills.
- Remember that even in large cities people within earshot who live many miles from your clinic could be a relative or friend of the participant. Once you have lost trust, it is almost impossible to regain it, and this reflects on all of WIC.
- A subpoena is a request for information issued by a clerk of a court in response to an attorney representing a party. Responding to a subpoena will be according to District legal guidance and Federal WIC Regulation. If a subpoena is provided, staff are to alert the WIC Coordinator or Supervisor and state office right away.
- A Memorandum of Understanding (MOU) is a term you may hear referring to an agreement two or more programs have to share information. An MOU tells what will be shared, why, and how the programs will protect that information from others. An MOU has to go along with written permission from the applicant or participant such as consent or release form.

How can you protect personal information of WIC applicants and participant?

- When making calls or speaking with a client, do it at a time and in a place where you can maintain privacy.
- Keep office doors closed so non-WIC staff or other participants walking by cannot overhear an appointment.
- Keep your documentation and notes in a safe, secure place.

- When leaving your computer, log off or lock the computer so others cannot see or access information about clients.
- Keep schedules or sign-in sheets covered. Mark names out as participants are seen.
- Do not discuss information about WIC clients with your family or friends.
- Do not share client information with any non-WIC staff, even if they work for another government agency, without asking your supervisor first.
- Remember to maintain confidentiality in all methods of communication.
- Clearly mark items as Confidential when sending via mail or fax if the information contains a client name, identifying information, or medical information.
- Use caution when sending participant information electronically since electronic communication is not always secure. A disclaimer notice should be included.
- If you have to send information via email, use the PID# or the FID# when referring to a participant in an email, don't use names. You may be able to encrypt or password protect the information being sent as well. Check with your supervisor for policy on sending private information.
- Collect permission on the consent portion of the Rights, Responsibilities, and Consent form at every certification.
- Be careful about leaving voicemail or answering machine messages for new clients unless you are sure they have given permission for you to do so.

Note: If you are not sure if information is confidential, check with your WIC supervisor or Coordinator to confirm. It is best to assume that all information you receive from a client is confidential.

Confidentiality Policy

Access the WIC policy manual. Open the chapter on Overview and Organization. Review the section on Applicant Records in Chapter 1, Section C.

TIP: Open the navigation tools and bookmarks to view the sections within the chapter.

Confidentiality Agreement

The Confidentiality Agreement is signed by all WIC and non-WIC staff committing to the protection of applicant and participant personal information. Signing the agreement confirms an understanding of the confidential nature of all WIC applicants and participant information and records.



Complete Activity 2 in your Activities Workbook

Special Concerns

Referrals

Best practice is to provide the referral information to the participant so they can reach out to the other program. To ensure confidentiality and to protect participants' rights and privacy do not give information about participants to people who should not have it. This includes other programs unless there is an agreement to share and/or participant written consent. For example, it is okay to give a participant smoking cessation referral information, but it is not okay to send the tobacco cessation program staff a contact list of all participants that smoke. Always consult with your WIC Coordinator or supervisor about any requests for information about a participant.

Suspected Child Abuse or Neglect

During appointments, staff should be aware of other signs or issues that cannot be addressed with a referral such as signs of child abuse. If staff suspect that an infant or child/children are being abused, this must be reported as required by law within twenty-four (24) hours to a law enforcement agency or appropriate department such as Idaho Department of Health and Welfare or a local Child Protection Services Office. Additionally, local agencies should refer to their Health District's policy and procedures for reporting mandatory abuse.

Signs of physical abuse include:

- Marks or injuries to a child when there is no reasonable explanation
- A pattern of repeated injuries
- Disclosure by the child that he or she was hurt by an adult
- Injuries that look suspicious (such as a bruise in the shape of a handprint)

Signs of neglect include:

- Living conditions that are unhealthy or safety hazards
- A child that has nothing to eat or appears hungry and underweight
- A child that appears dirty, unkept and inappropriately dressed for weather
- A child that has been left at home alone or abandoned with no home to go to