Oregon Family Support Network Policy

Policy Area:	Subject: Policy Manual
Title of Policy: Confidentiality	Contract Area:
Effective Date: 6.24.19	Number:
Approved Date: 6.24.19 Revision Date: 04.17.2026	See Also:
Approved By: EOC 6.24.19	

Oregon Family Support Network (OFSN) is committed to providing high-quality, confidential services to the families it supports. No information shared with OFSN will be disclosed to any organization or individual without the user's expressed permission, except where required by law.

OFSN operates as a business associate, as defined in its local, regional, and state contracts. As such, OFSN upholds the requirements of the **Health Insurance Portability and Accountability Act of 1996 (HIPAA)**, as defined in the **United States Code of Federal Regulations (CFR)**, **Title 45**, Section 160.103. These regulations govern the privacy and security of personal health information and establish OFSN's responsibility to safeguard, store, retain, and report any breaches of protected health information (PHI) in the course of its work with children, youth, and families.

For these reasons, OFSN maintains personal data about its staff and the families it serves and will use such data only for the purposes for which it was collected. Any personal health information obtained through service delivery will not be disclosed outside the organization without prior authorization from the individual who provided the information, except as permitted or required by law.

All personal data will be handled sensitively and in the strictest confidence, both internally and externally.

1.0 Purpose

The purpose of this policy is to ensure that all staff members, volunteers, and service users understand OFSN's requirements regarding the protection, use, and disclosure of personal data and confidential information, and to ensure compliance with applicable state and federal privacy laws.

1.1 Definitions

- **Confidentiality:** The protection of personal, sensitive, or identifiable information obtained through OFSN's work, ensuring it is not disclosed without proper authorization.
- **HIPAA**: Federal legislation that establishes standards for the privacy and security of medical information.
- **Protected Health Information (PHI)**: Any information that can identify an individual and is created, used, or disclosed in the course of providing health-related or support services.

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2. Policy

2.1 Principles

- All personal paper-based and electronic data must be stored and handled in accordance with HIPAA and protected against unauthorized access, accidental disclosure, loss, or destruction.
- Access to personal data is limited to authorized individuals who require the information to perform their duties.
- Only the minimum necessary information should be accessed, used, or disclosed to support service delivery.

2.2 Records Management

- All physical records must be stored in locked filing cabinets or secure locations when not in use. This includes notebooks, correspondence, and any documents containing confidential information.
- Electronic records must be maintained within secure databases or electronic systems with appropriate access controls.
- Staff may only access records for service users they are actively supporting.

2.3 Field-Based Services and Community Work

OFSN recognizes that staff frequently provide services in community settings, including family homes, schools, and other public environments. Additional precautions are required to maintain confidentiality in these settings.

- All protected health information **(PHI)**, whether paper-based or electronic, must be secured at all times during transport and while in the field. Records must not be left unattended in vehicles, public spaces, or unsecured locations.
- Paper documents must be kept out of sight and stored in secure folders or bags during transport and visits.
- Electronic devices used to access client information must be password-protected and used in a way that prevents unauthorized viewing (e.g., screen positioning, use in private settings when possible).
- Conversations involving confidential information must be conducted in a manner that protects privacy, particularly in home or community environments where others may be present.
- Only the minimum necessary information should be accessed or shared during fieldwork or home visits.

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- At the conclusion of each visit, all records, notes, and devices must be promptly secured in accordance with OFSN recordkeeping practices and HIPAA requirements.

2.4 Data Collection Activities

- OFSN collects data to report to funders and to measure progress toward organizational goals.
- Any data shared externally will be aggregated and de-identified, ensuring that no personal identifying information is disclosed.
- Participation in data collection activities requires informed consent. OFSN utilizes a standardized consent form that outlines the risks and benefits of participation.

2.5 Disclosure Without Authorization

OFSN recognizes that there are limited circumstances in which disclosure of protected health information may be required by law.

- Confidential information may be disclosed to law enforcement, first responders, or other authorized entities when required by state or federal law.
- In such cases, only the minimum necessary information will be shared to fulfill the purpose of the disclosure.

2.6 Non-Adherence

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or volunteer status. OFSN will respond promptly to any breach or suspected breach of confidentiality in accordance with applicable laws and contractual obligations.

Oregon Family Support Network

Oregon Family Support Network, Inc.
Confidentiality Statement

Instructions: This statement shall be reviewed and signed by each employee and volunteer of Oregon Family Support Network, Inc., on an annual basis and shall be on file in Human Resources and individual personnel file.

Confidentiality is the preservation, in confidence, of all information concerning a family, which may be disclosed in a relationship between the family and OFSN, mental health, general health care professionals, and human service workers.

Any information concerning a specific family is confidential. This includes confidential information which has been transmitted electronically via a fax machine, text messages, email or family notes.

Casual disclosures to other staff members or volunteers without a legitimate "need to know" or to family members or friends are not only harmful to the family's privacy rights but are also illegal.

Under Oregon law, Oregon Family Support Network, Inc. may be legally liable for your actions that are within the course and scope of your duties as an employee or volunteer. However, improper disclosure of confidential information could be considered not to be within the course and scope of your duties. As a result, OFSN could refuse to defend you in any legal action that might be brought by a family for violating their confidentiality.

MY SIGNATURE BELOW CERTIFIES THAT I HAVE READ AND FULLY UNDERSTAND THE INFORMATION ABOVE. I FURTHER UNDERSTAND AND AGREE THAT, AS AN EMPLOYEE OR VOLUNTEER FOR OREGON FAMILY SUPPORT NETWORK, INC., I HAVE A DUTY TO ABIDE BY THE LAWS AND POLICIES GOVERNING THE PRESERVATION OF CONFIDENTIAL INFORMATION AND THAT I WILL ABIDE BY THOSE LAWS AND POLICIES.

_____ _____

Employee or Volunteer Signature Date

_____

(Printed Name)

_____ _____

Human Resources or Supervisor Signature Date

Statewide Office / 4275 Commercial St SE, Ste 180, Salem, OR 97302 / 503-363-8068(p) / 503-390-3161(f)/ www.ofsn.org

Standard Operating Procedure

SOP TITLE: Confidentiality	SOP NUMBER:	EFFECTIVE DATE:	RELATED POLICY(S):

APPROVAL BLOCK

APPROVALS	TITLE	SIGNATURE/DATE
Prepared By:	Deputy Director	6.6.19
Reviewed By:	EOC, Strategic Leadership	6.24.19, 04.03.2026
Approved By:	EOC	6.24.19

1. PURPOSE

To establish guidelines to comply with all federal and state laws related to the Health Insurance Protection and Accountability Act (HIPAA) as well as other state and federal privacy laws regarding confidentiality and privacy.

2. PROCEDURE

Responsible Party	Action Step
	Working Instruction
Employee	1. All new employees will be required to complete a confidentiality agreement during the onboarding process.
Supervisor	2. Supervisors will discuss OFSN's confidentiality

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Responsible Party	Action Step
	policy and privacy protections with employees to document that employees understand the policy and know how and when to report a confidentiality breech.
Supervisor	3. Supervisors are to document the date that this conversation occurs on an annual basis and forward that documentation to Human Resources.
Employee	4. Annual training will occur as directed by supervisor.
Employee	5. If employee, believes confidentiality has been compromised, they will notify their supervisor or a director immediately
Supervisor	6. Supervisor will document any confidentiality breeches and action required, including notifying a member of the EOC.
Staff	7. If there is an exception to any of the above, please contact your immediate supervisor.
	Revising, Routing and Approving SOP
	8.
	9.
	10.

3. DEFINITIONS/ACRONYMS

EOC- Executive Operations Committee

4. ASSOCIATED FORMS

Standard Operating Procedure

SOP TITLE: Confidentiality	SOP NUMBER:	EFFECTIVE DATE:	RELATED POLICY(S):

Confidentiality Agreement

HISTORICAL RECORD

REV #/DATE	WRITTEN/ REVISED BY	DESCRIPTION OF CHANGE