

	Confidentiality of Client Information and Privacy Policy	
	Policy Number	1300-1302
	Effective Date	4.1.2019
	Revision Dates	4.12.2023
	Regulatory Code	COA CR 2
	Attachment	Client Rights and Responsibilities

Policy

West Michigan Partnership for Children (WMPC) will protect the confidentiality of information about clients and assume a protective role regarding the disclosure of confidential information. When a request for confidential information is received about a client, WMPC will determine whether the release of information is valid and has received written authorization from client, parent or legal guardian. All consent records will be kept within the case file and provided copies of the signed release to the client.

Procedures

- A. All information regarding past, present and future clients and/or their relatives is confidential and is covered by these procedures.
 1. Information is shared among WMPC team members, network child placing agencies, and foster parents only on a need-to-know basis.
 2. Under no circumstances will a team member share information about past, present, and future clients outside his/her responsibilities and duties as a team member working on a specific case.
 3. If approached by individuals seeking information outside these parameters, the team member will decline to offer information.
 4. Team members will practice extreme diligence in sharing information only in team--secure areas and will not discuss clients in any area where members of the public may hear.
 5. Written consent will be required from client or legal guardian prior to recording, photographing or filming.
 6. Volunteers who work with WMPC and its network providers are also subject to the need-to-know rule.
 - a. Team members that oversee the work of volunteers will share minimal information with volunteers about specific clients, sharing information only to the extent that it impacts the scope of the volunteer's work with the client.
 - b. Volunteers are required to sign a confidentiality statement.
 7. All WMPC team members, network providers, volunteers, and foster parents will receive appropriate training on confidentiality and ethical standards.
 8. WMPC and subcontractors follow MDHHS policies as it pertains to case records and confidentiality.
- B. Access to records.
 1. All client records are electronic and WMPC does not create a paper file on any client. All documentation is in MISACWIS.
 2. All requests must be made in writing and dated. Some of these requests may come in the form of a *subpoena* or summons and may require a special review by the WMPC legal team. Within thirty (30) days of receipt, WMPC will provide a response to the records request, unless otherwise ordered by

a Court or for a criminal investigation. This policy pertains to records requests at WMPC as well as our network provider subcontractors. WMPC will inform clients of these circumstances.

C. Data Agreement

1. WMPC maintains an agreement with a data/technology company that includes records management.