



# Confidentiality Questionnaire

Some questions may have multiple parts, so please be sure to answer each part. Please be thorough and detailed in your responses. If a question is not relevant to your Site, or if you are unable to answer, please write N/A and provide a brief explanation.

## 1. General Information

- a. Email
- b. Organization Name
- c. Name & Title

## 2. Email encryptions

- a. Please give a brief summary of your email encryption procedure.
- b. How are staff training on encryption processes?
- c. What is your protocol for using personal information in the subject line of an email?

## 3. Confidentiality

- a. Describe your site's policies, procedures and/or other safeguards in place to ensure confidentiality and keep safe protected health information (PHI).
- b. What is your site's policy regarding sharing PHI internally, both among eligibility teams and between departments?
- c. What are the reasons you can disclose PHI, both to county employees and to external partners?
- d. How do you determine how much PHI to disclose?
- e. What are the acceptable reasons to use PHI?
- f. How much PHI should be requested from an applicant or member to determine eligibility?
- g. What is your site's process if you get a request for PHI from an outside entity?
- h. What is your Site's process if you get a request for PHI from HCPF?
- i. If your site was to get a request for PHI from the Federal Department of Health and Human Services, what would be your next steps?
- j. What is your site's procedure if you were to have an improper disclosure or a breach of PHI?
- k. In the event of a breach or improper disclosure, how long must you retain the PHI involved in the disclosure or breach?
- l. What is your site's records retention procedure
- m. Does your site contract with any vendors who have access to PHI (shred company, IT maintenance, office cleaning crews, etc.)
  - i. Yes
  - ii. No



- n. What are the procedures in place to ensure vendors have signed privacy and security agreements (Business Associate Agreements, Privacy/Security sections in contract, etc.)?

#### 4. Supporting Documentation

- a. Please upload any policy and procedures in place concerning privacy and safeguarding protected health information (PHI).
- b. Please upload any written procedures regarding email encryption. If those procedures are included in your PHI policies, there is no need to upload both.