

Region 9 AAA	Local Policy #	17
Policy Name	Privacy Compliance	
Original Policy Date	March 2011	
Review/Revise Date	April 7, 2011, March 10, 2014, November 2016, September 2021	

Policy:

It is the intent of the Area Agency on Aging to ensure all participant information is held in the utmost secure environment. Protections must be taken to ensure all formats of protected information are addressed within the organization. This includes written data, physical storage, electronic data, verbal information, disposal, etc.

In accordance with increasing federal and state legislation, subcontractors must develop, implement, and maintain comprehensive privacy policies and procedures for the organization's employees and volunteers. For those subcontractors that receive protected health information, the policies and procedures are to minimally meet the requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health of 2009 (HITECH) and related updates.

Procedures:

1. Required elements for entities receiving protected health information include the following components: (this is not an all-inclusive list)
 - A. Policy and Procedures (including Breach Notification)
 - B. Authorization to Release Information form
 - C. Business Associate Agreement
 - D. Relevant and routine staff training
2. The Area Agency on Aging will provide the subcontractor with sample documents and training to the extent possible; however, the ultimate responsibility rests with the Subcontractor.
3. Subcontractors are to stay abreast of new developments regarding ongoing and new legislative changes regarding privacy and confidentiality laws.