



PROCEDURE

Title/Subject: Confidentiality and Contractual Relationships			
Policy #: OPS-104	Page 1 of 1	Adoption Date:	Revision Date: 1/20/05
Approved By:		Title: President/Chief Executive Officer	
Approved By:		Title: Program Vice President/CQI Chairperson	
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The Florida Center for Child and Family Development (The Florida Center) ensures that all contractual relationships that the agency enters into do not violate internal policy and procedures that govern professional practices and confidentiality. The Florida Center complies with all applicable federal and local laws regarding confidentiality when performing contractual activities, including the Health Insurance Portability and Accountability Act (HIPAA). Legal council shall be obtained as needed when client records are subpoenaed, or when special or unusual information about an individual client is sought by the courts, public officials, investigative units, or law enforcement bodies.

Information is shared among staff, agencies and foster parents of children involved with Community Based Care (CBC) only on a need-to-know basis. Under no circumstances will staff members share information about past, present or future clients outside his/her responsibilities or duties. Staff will practice extreme diligence in sharing information, and will not discuss clients in common areas of the facility where members of the public may hear such information. All employees of The Florida Center read and sign a confidentiality statement at the beginning of their employment with the agency.

Employees of The Florida Center involved in Continuous Quality Improvement (CQI) activities, funders, and regulatory agencies may review client records related to quality improvement and monitoring activities. Funders and regulatory agencies may review personnel files to ensure proper documentation of their screening, qualification and any other contractual or licensing requirements.