

<p>WEBER HUMAN SERVICES</p> <p style="text-align: center;">Policy & Procedure</p> <p style="text-align: center;">HIPAA/PRIVACY FUNDRAISING</p>	<p>NUMBER</p> <p>15</p>
	<p>APPROVED</p> <p>2/21/2014</p>
	<p>REVIEWED</p> <p>5/11/2017</p>
	<p>REVISED</p>

POLICY:

All Fundraising activities at Weber Human Services (WHS) will be in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), including the Final Omnibus Rule of 2013.

PURPOSE :

The purpose of this policy is to provide guidance to the Facility workforce members on the use of patient information for fundraising purposes. This policy also outlines the proper procedures to follow when a patient opts out of receiving fundraising communications.

PROCEDURES:

- All clients are provided the Notice of Privacy Practices (NPP) at registration. It informs patients that the Facility may use their information to contact them about fundraising activities at the Facility.
- Clients have the right to opt out of receiving fundraising communications. The Facility may not send fundraising communications to or otherwise contact individuals who have opted out of receiving such communications.
 - All employees must consult with the Privacy Officer before sending any correspondence to clients to verify that they have not previously communicated their right to be removed from lists related to fundraising activities.
 - Communications by phone for a fundraising purpose must clearly inform the individual that they have the right to opt out of receiving future communications.
 - The Facility may not condition an individual's treatment or payment on whether or not they have opted out of receiving fundraising communications.
- The following client information may be used for fundraising purposes:
 - Demographic information, including name, address, date of birth, age and gender
 - Health insurance status
 - Department of service
 - Date of service
 - Treating staff
 - Treatment outcome (favorable outcome, suboptimal outcome, or deceased)

FUNDRAISING OPT OUT PROCEDURE

- The Privacy Officer maintains a list of individuals who have requested to be removed from future fundraising communications.
- Before contacting clients for fundraising purposes, employees must contact the Privacy Officer to verify that the individuals they wish to contact have not opted out.
- Any workforce member advised by a client of his/her request to opt out of receiving future fundraising communications must contact the Privacy Officer to document the request.
- Written materials mailed to clients for the purpose of soliciting a donation must include the following required opt out language:

If you wish to be removed from future WHS fundraising communications, please contact the Privacy Officer by telephone (801) 625-3700 or email (contactWHS@weberhs.org)

- *Verbal communications/telephone solicitations must also advise patients of the right*
- *Questions about this policy should be directed to the Privacy Officer.*