THE COUNSELING SOURCE, INC. POLICY AND PROCEDURE

<u>TITLE</u>: Texting of client PHI (Protected Health Information)

<u>PURPOSE</u>: To inform employees of the company's expectations surrounding text messaging of client's PHI in order to maintain client confidentiality and security of client information.

POLICY:

- 1. Employees of The Counseling Source should never use text messaging for the transmittal of PHI. Employees should maintain a thorough understanding of the potential risk involved in texting client PHI and how texting of PHI could potentially jeopardize client confidentiality.
- 2. It is understood that some clients/guardians and other involved parties may use text messaging as their primary source of communication with employees. The use of text messaging by clients, guardians, and others cannot be controlled by employees. In the event of a client, guardian, or other involved party using text messaging to transmit PHI, it may be appropriate for the employee to have a conversation with the client/guardian/other about the potential risk involved with texting of PHI, while explaining that their responses will be limited and will not include PHI. Employees should never reply to these text messages using PHI and should not restate the original stated PHI in their responses.

REVIEWED: March 2018