

Title: Communication Policy

Policy No. 003

Effective Date:

Next Review Date:

Developed by: The Center for Health and Wellness Law, LLC On: 2022

Last Revised by: The Center for Health and Wellness Law, LLC On: 2023

Policy: will maintain, to the greatest extent possible, client privacy when engaging in client communications regarding the client's Health Information in public and private locations through reasonable security safeguards. Client communications regarding Health Information should be done in a manner which maintains the client's privacy and protects unauthorized access to the Health Information. Client communications may occur through email and online video conferencing platforms.

Health Information includes, but is not limited to: the results of, or participation in wellness coaching sessions, questionnaires, exercises, general wellness education or services; medical history; or information protected under the Health Insurance Portability and Accountability Act of 1996, Public Law 104-91, as amended, and related HIPAA regulations (45 CFR. Parts 160-164).

Procedure: To ensure client privacy the following will occur for communications made via:

1. Online Video conferencing: Prior to starting the live online video conference with the client, a secure setting will be established by using a private computer or phone on a secure network, in a location away from bystanders. If the location becomes unsecured (to the extent the communications can be overheard or viewed by bystanders) or the network becomes unsecured, the communications will cease until a secure location is established.
2. Email: Prior to engaging in email communications with the client, a secure setting will be established by using a private computer or phone on a secure network. If the network becomes unsecured, the communications will cease until a secure network is established. All emails will include the disclaimer found in Policy 002 Storage, Safeguards, and Disposal.