Attachment 1: Privacy Authorization Matrix – Sharing Protected Health Information for purpose of Treatment

I. Treatment Purposes

When allowed by law, Protected Health Information (PHI) may be shared for treatment purposes across disciplines and programs on a "need-to-know" basis and for the purposes of improving health outcomes. SBC providers may share client PHI with one another.

HIPAA defines treatment as "the provision, coordination, or management of health care and related services by one or more health care providers, including the coordination or management of health care by a health care provider with a third party; consultation between health care providers relating to a patient; or the referral of a patient for health care from one health care provider to another." References: (45 CFR sec.164.506, 45 CFR 164.501 45, CFR 164.506).

Description of PHI	Who may disclose it?	Who may receive it?
General Health Includes knowledge of Mental Health, Substance Use/Abuse, HIV/AIDS, STD conditions	General Health Provider	Client's providers and providers' staff for the purpose of treatment, diagnosis, or referral
Mental Health Includes knowledge of General Health, Substance Use/Abuse, HIV/AIDS, STD conditions	Mental Health Provider	Any healthcare provider (any discipline) "who has medical or psychological responsibility for the patient"

II. Treatment Providers

Individual practitioners and program staff in SBC that furnish health services in the normal course of their business are considered treatment or healthcare providers. Their clinics must be bound by state and federal confidentiality laws.

The following are some examples of other treatment providers whose clients' PHI may be shared for treatment and coordination purposes without an authorization:

A. Individual practitioners and treatment providers of private sector hospitals and clinics who are bound by state and federal confidentiality laws.

B. School nurses, licensed clinical school social workers for purposes of treatment.

C. Mental Health Information excluding psychotherapy notes.

As defined by HIPAA mental health information includes case management/coordination communication, medication prescription and monitoring, counseling session start and stop times, the modalities and frequencies of treatment, results of clinical tests, and any summary of the following items: diagnosis, functional status, treatment plan, symptoms, prognosis, and progress to date.

D. Providers who sell or dispense drugs, devices, equipment, or other items in accordance with a prescription.

E. Questions about who is and who is not a health service provider should be directed to SBC Privacy Coordinator.