

Health Information Privacy Policy

Overview

The Children's Trust Fund (CTF), in its role as a grantor, collects and stores Personally Identifiable Information (PII) and limited Protected Health Information (PHI) of home visiting participants collected by its grantees, subgrantees, contractors, partners and collaborators. To ensure the privacy of home visiting participants and their families and the ethical use of data for program oversight, evaluation, improvement, fulfillment of federal/state reporting requirements, advocacy and policy-making purposes, CTF adheres to all federal and state healthcare privacy laws, including the **Health Insurance Portability and Accountability Act of 1996 (HIPAA)** and any applicable rules or regulations arising thereunder.

CTF takes its obligations to protect the privacy of the data it collects, uses, shares and stores seriously. The privacy of home visiting participants in programs funded by CTF shall be protected with intentionality and as required by law.

Scope

This policy applies to all CTF employees, contractors, partners and collaborators who access, manage or analyze data received from home visiting grantees and subgrantees, as well as any other collaborating Covered Entity under HIPAA.

Definition of Home Visiting Participant PII & PHI

Personally Identifiable Information (PII) includes home visiting information that is collected, maintained, generated or inferred and that, alone or in combination, personally identifies an individual participant or the participant's parent(s), guardian(s) or family.

PII also includes other information that, alone or in combination, is linked or linkable to a specific participant and would allow a reasonable person in the community who does not have personal knowledge of the relevant circumstances to identify the participant with reasonable certainty.

Protected Health Information (PHI) collected by CTF includes birth record information and pregnancy and postpartum diagnosis codes used in billing Managed Care Organizations (MCOs) for home visiting services provided.

Data Collected

CTF shall collect only the minimum necessary PHI/PII to fulfill aggregate data analysis goals. CTF may receive the following categories of data from grantees, subgrantees and other collaborating Covered Entities:

- Individual-level service data (e.g., visit dates, service types)
- Demographic information (e.g., age, race/ethnicity, ZIP code)
- Program participation details (e.g., screens, assessments or activities)
- Limited identifiers (e.g., client ID codes, birth dates)
- Diagnosis codes for pregnancy and postpartum services
- Other data elements necessary for grant monitoring and evaluation

Grantee Policy Usage Guidelines

Before receiving any PHI/PII, CTF must execute a contract with each home visiting grantee or subgrantee that requires the grantee or subgrantee to comply with the *REDCAP Policy Usage Guidelines*.

Permitted Uses and Disclosures

PII and PHI collected from grantees, subgrantees and Covered Entities may only be used for:

- Grant compliance and performance monitoring
- Program evaluation and quality improvement
- Aggregated reporting to stakeholders and community partners
- Public health analysis consistent with HIPAA allowances
- Billing MCOs for services provided by home visiting agencies
- Research, program evaluation, quality improvement and policy development purposes

Only the minimum necessary PHI/PII will be collected to fulfill data analysis goals.

Breach Notification

Any suspected or confirmed breach of PII or PHI must be reported immediately to the CTF Director and Privacy Officer. CTF will investigate such reports and, if necessary, notify the Office of Administration, Information Technology Services Division (OA ITSD), collaborating Covered Entities and affected grantees and partners. CTF will comply with applicable breach notification laws.

Training and Compliance

All staff with access to home visiting data must complete HIPAA training upon hire and annually. The Privacy Officer will conduct periodic audits to ensure compliance with this policy and applicable regulations.

Policy Review and Updates

This policy shall be reviewed annually and updated as needed to reflect changes in law, regulation or organizational practices. Updates must be approved by the CTF Executive Director, Privacy Officer and the Board of Directors and communicated to all relevant personnel.