

**Policy Clarifications - Cash Assistance - All
Medicaid - All
SNAP
PCA15660104
PMA15660304
PFS15660504**

Submitted: 02/11/11

Agency: CAOs

Citations:

Subject: Transmittal of Client Information via Email

Can client information be transmitted via email to Community Partners or other organizations?

Response By: Division of Health Services

Date:02/14/11

No.

Client information should not be transmitted via email to anyone including clients outside of the CWOPA address.

EXCEPTION: Client information can be transmitted via (SECURED) email for the following situations:

- The applicant/recipient either verbally or in writing, informs the caseworker that they may speak to a representative or organization representing the applicant/recipient

Or

- The organization has a Business Associate agreement with the Department and the release of information is specifically for purposes related to the Business Associate agreement and contract the Department has with the organization.

- Business Associate agreements are documents that outline the confidentiality requirements of a contract between the Department and other agencies. This satisfies program confidentiality laws and HIPPA requirements.

REMINDER: Community Partner Organizations do not have power of attorney or any other power unless the client specifically grants it verbally or in writing. Due to HIPPA regulations, they are not entitled to benefit information or any additional information about a case unless the above conditions are met.

Organizations with Business Associate agreements include but are not limited to:

BenePhilly Pilot Project:

04/15/2010 - 09/29/2012

SNAP outreach pilot focusing on the elderly in Philadelphia.

SNAP/UC Pilot Project:

07/1/2010 - 06/30/2011

SNAP outreach pilot focusing on those who have exhausted and are exhausting or have been denied unemployment compensation benefits statewide.

SNAP/MIPPA Pilot Project:

10/1/2010 - 09/13/2013 (not implemented yet)

SNAP outreach pilot focusing on elderly in approximately 40 counties statewide.

If you have questions or for verification that an organization has a Business Associate agreement, contact your Area Manager.