

**GILEAD COMMUNITY SERVICES, INC.  
POLICY AND PROCEDURE MANUAL**

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**Policy Title: Personal Information and Social Security Number  
Safeguards**

**Section: 1.1.16.**

**Date Revised: 12/8/08**

**Reviewed: 12/8/08**

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**Scope:** All Clients and All Staff.

**Policy:** Gilead Community Services provides safeguards designed to protect the personal information (including social security numbers) of its personnel and clients. These safeguards include efforts to keep personal information and social security numbers confidential, limit access to only those personnel that need this information, prevent the unlawful disclosure of this information, and effectively dispose of this information in a manner that ensures it is not retrievable after disposal. Gilead notifies its clients and staff of this policy as soon as possible through the initial documentation requesting this information. This policy is also publicly displayed. Gilead continually works to comply with all federal and state law (including Public Act No. 08-167) regarding the protection of personal information and social security numbers. Any Gilead staff member who violates this policy may be subject to civil or criminal penalties and the breach of confidentiality could lead to disciplinary action (up to and including termination of employment).

*Personal Information is defined as: non-public information which is associated with a specific individual through one or more identifiers. Examples include Social Security numbers, drivers' license numbers, state identification numbers, credit or debit card numbers, passport numbers, health insurance identification numbers, and alien resident numbers.*

**Procedure:**

Safeguarding and Limiting Access to Personal Information and Social Security numbers

1. Gilead makes reasonable efforts to protect the confidentiality of all personal information, (including Social Security numbers) that is collected from its clients, staff, or potential clients & job applicants. These efforts include locked storage with limited access to appropriate personnel for paper records, and encryption and/or password protection for electronic records.
2. Gilead limits access to both paper and electronic records containing staff and/or client personal information to only those personnel with a "need to know" to perform their job duties. Gilead also limits the use of Social Security numbers in its paper and electronic records, whenever appropriate. No personal information will be disclosed outside of Gilead without the appropriate authorizations (as indicated in other Gilead policies) or as permitted by law.

Effective and Safe Disposal of Personal Information

1. All Hard-copy, Paper Records containing Personal Information and/or Social Security numbers that are approved for disposal (as indicated in other Gilead policies), will be destroyed by physical shredding.
2. All Electronic Records containing Personal Information and/or Social Security numbers that are approved for disposal (as indicated in other Gilead policies), will be destroyed by an irreversible electronic deletion method.

Public Notification of this Policy and Training

1. This policy will be posted publicly on Gilead's website at [www.GileadCS.org](http://www.GileadCS.org) for review by any interested parties.
2. Gilead's Paper Referral form will indicate the availability of this policy on Gilead's website at [www.GileadCS.org](http://www.GileadCS.org) for review by potential clients providing personal information and/or Social Security numbers. For potential clients to Gilead's Outpatient Clinics, the notification of the availability of this policy for their review on the website will occur verbally by the clinician conducting the telephone screen and documented on the screen itself.
3. Gilead's Application for Employment form and Background Inquiry Release form will indicate the availability of this policy on Gilead's website at [www.GileadCS.org](http://www.GileadCS.org) for review by potential job applicants providing personal information and/or Social Security numbers.
4. All newly admitted clients will be trained on this policy and this training will be documented as part of their Client Orientation Checklist.
5. All newly hired staff will be trained on this policy and this training will be documented as part of their Human Resources Orientation Checklist.

In the Event of a Breach involving Personal Information

1. In the unlikely event of an intentional or unintentional breach of anyone's personal information, Gilead will notify all affected individuals of the breach as soon as possible after the breach is discovered, as required by law.
2. If the breach affects individuals of a state other than Connecticut or if any state or federal law requires additional notifications or other actions, Gilead will comply with those laws as well.