

POLICY TITLE: Employee Confidentiality

PURPOSE: To protect the confidentiality of resident and personnel records of the Masonic Home of Virginia (Home).

GENERAL POLICY STATEMENT: All records and personal information relating to the Home's current and prior residents and employees are confidential and employees must, therefore, treat all matters accordingly.

DETAILED POLICY STATEMENTS: The records and information covered by this policy are defined as but not limited to medical records, documents, notes, files, oral information, electronic or computer files and similar materials. Disclosure is defined as discussion, distribution, copying or removal either on purpose or inadvertently to any unauthorized person inside or outside of the Home's premises. Exceptions would be in the employee's ordinary course of performing job responsibilities on behalf of the Home or with permission from the Chief Executive Officer (CEO) or designee. Employees unsure about the confidential nature of specific information must ask their supervisor/department director for clarification. Employees will be subject to appropriate disciplinary action up to and including termination for violation of this policy.

A. Health Insurance Portability and Accountability Act (HIPPA) protects the health information of employees and residents as follows:

1. Employee Health Information:

- a) HIPPA protects employee health information as it relates to insurance plans (medical, dental, vision, flexible spending, employee assistance) and employee health information for employment-related purposes such as the administration Paid Time Off benefit time, Worker's Compensation, Leave of Absence and Employee Health and any other such plans as determined by HIPPA legislation.
- b) It is the responsibility of the Home to ensure that Protected Health Information as defined by HIPPA is treated confidentially and used in compliance with HIPPA guidelines.
- c) Protected Health Information may not be shared with individuals not employed in Human Resources, Employee Health or Payroll except when expressly approved by the CEO or designee. Only the particular information that is reasonably necessary to perform the human resources, employee health, payroll or other approved functions will be shared.

- d) All confidential medical information regarding employees must be maintained separately from the employee's personnel file and other records and must be secured in a locked file cabinet.

- 2. Resident Health Information: As with employee health information, it is the policy of the Home to protect our residents' confidential health information. For detailed guidelines, refer to the Home's Administration Policy regarding HIPPA.

B. Employee Records and Privacy:

- 1. The Human Resources Department maintains a personnel file on past and present Home employees.
 - a) The personnel file includes information necessary for business purposes, legal purposes and to remain in compliance with federal and state laws and regulations.
 - b) The personnel files are kept in locked file cabinets in the Human Resources Office.
 - c) Access to the information contained in the file is limited to Human Resources staff. Information may be viewed in the presence of the Human Resources Director or Human Resources Staff designee as outlined below in sections d) and e).
 - d) Limited information on a clear need-to-know basis is available to the following individuals:
 - i. The employee's immediate supervisor/department director
 - ii. The CEO
 - iii. A member of the Human Resources Committee of the Board of Governors
 - iv. An employee representing a financial auditing company hired by the Home
 - v. A federal/state employee representing a regulatory agency
 - vi. A court-ordered subpoena
 - e) The employee may request to review his/her personnel file by contacting the Human Resources Director. The file must be reviewed in the presence of a Human Resources staff member. The employee may make notes of file information but may not photo copy, insert, remove or alter material in the personnel file. In the event the employee dis-

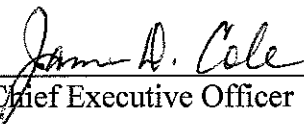
Masonic Home of Virginia

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agrees with any item, the employee may write a statement of disagreement which will be reviewed by the Human Resources Director and placed in the employee's personnel file.

2. Release of employee information:
 - a) Human Resources staff may release only specific information to an outside source and only with the written consent of the employee.
 - b) Human Resources staff may only confirm dates of hire/termination, job title and salary to outside sources as previously released by the employee to the outside source.
3. Confidential personnel information contained in the Human Resources/Payroll Information System.
 - a) Data necessary to produce employee paychecks and provide applicable benefits is maintained in the ADP computer system.
 - b) Data necessary to maintain compliance with federal/state regulatory agencies is maintained in the ADP computer system.



Chief Executive Officer

Date April 11, 2007

**MASONIC HOME OF VIRGINIA
CONFIDENTIALITY AGREEMENT**

I understand that **my position** involves working with confidential information related to the residents and/or employees of the Masonic Home of Virginia. I further understand that the Masonic Home of Virginia must comply with all federal and state laws related to the confidentiality of resident/employee information such as but not limited to Health Insurance Portability and Accountability Act (HIPAA).

I will not divulge nor reveal any of this information to any persons not authorized to have access to such. I understand that as a public charity, the Masonic Home of Virginia exists solely due to the generosity of its donors and that any information related to donors, including gift amounts, may not be disclosed except in accordance with established policies. In addition, I will not discuss any resident, donor or employee information in a place where other staff, resident, or another person may hear the conversation.

If it is determined that I have divulged or revealed the information described above to an unauthorized person, or that I have discussed confidential information in a public location, I would be subject to disciplinary action up to and including termination from employment with the Masonic Home of Virginia.

The above information has been reviewed with me.

Employee Name (Please Print)

Date

Employee Signature

Date