NORTHERN NEVADA ADULT MENTAL HEALTH SERVICES
POLICIES AND PROCEDURE

SUBJECT: PROTECTING HEALTH INFORMATION OF CONSUMERS IN CO-EXISTING RELATIONSHIPS

NUMBER: NN-RI-22

ORIGINAL DATE: 05/01/08

REVIEW/REVISE DATE: 2/17/11

APPROVAL: Rosalyne Reynolds {s}, Agency Director

I. PURPOSE

The purpose of this policy is to establish guidelines for safeguarding consumer information when the same clinician has a therapeutic relationship with individuals who are related.

II. POLICY:

Northern Nevada Adult Mental Health Services (NNAMHS) shall make every effort to protect and safeguard against disclosure of any consumer information to a person not authorized to receive the information. The agency will make every effort to assign consumers in such a way that the same clinician is not assigned to other members of a consumer's family, roommates, significant others, work-related colleagues or close friends.

III. REFERENCES:

a. NNAMHS Policy NN-IM-PS-02, Release of Consumer Information.
b. Nevada Administrative Code (NAC Chapter 449 Medical and Other Related Facilities).
c. Ethical Principles of the American Psychological Association.

IV. DEFINITIONS:

1. Consumer: Any person who requests services at NNAMHS.
2. Clinician: Any health care provider who has a professional relationship with a consumer to assess, consult, diagnose, or treat the consumer.

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3. Health Care: Any care, service or procedure provided by a health care provider to diagnose, treat, rehabilitate, or maintain a consumer's physical or mental condition, or structure, or any function of the human body.
4. Protected Health Information: Any information, whether oral or recorded, in any form or medium, which identifies or can readily be associated with the identity of a consumer and relates to the consumer's health care.
5. Related Consumers: A genetically linked, romantically linked, legally-linked, friendship linked, or employment linked association with another person. Examples include family, roommates, couples, significant others, colleagues from work, or close friends.

V. PROCEDURE:

1. Each clinician will make every reasonable effort with each new consumer assignment not to take on consumers with pre-existing relationships with consumers already on their case-load.

a. During intake procedures, another clinician should process this case if possible.

2. If such relationships are not well established at the beginning of service, but are discovered during the course of treatment, the clinician shall disclose this to their supervisor and proceed as follows:
   a. Initially make each consumer involved aware of the discovery and provide them with the option of reassignment to another therapist.
   b. If both consumers involved decide not to break the therapeutic alliance with the clinician, they may continue to pursue the already ongoing treatment, provided that full disclosure of potential implications is being made to both consumers involved.

      i. It is then particularly important to safeguard against Inadvertent disclosure of information.
      ii. Such cases should be rare and closely supervised.
      iii. In general, reassignment of one or both consumers should occur. The exception will be the case where both consumers involved do not wish to interrupt the ongoing therapeutic process.
3. If it is discovered that two members of a particular group are too closely related, the consumers may be reassigned to separate groups, if at all possible. If the consumers refuse to be reassigned, each consumer will meet with the group leader to discuss alternatives.