

## **Notice of Privacy Practices**

RehabWest, Inc. (RehabWest) has established privacy practices to protect the confidentiality of Protected Health Information (PHI) and Individually-Identifiable Health Information (IIHI). RehabWest's IT Manager is responsible for establishing these practices and distributing them to clients via the Notice of Privacy Practices through RehabWest's website, <http://rehabwest.com/>.

### **1. How RehabWest Uses PHI and IIHI**

RehabWest utilizes PHI and IIHI for the purposes necessary to conduct all business operations across our various service departments.

We implement information systems, electronic and paper, to collect, maintain and analyze information necessary for organizational processes.

Our policy and procedure for the storage, maintenance and destruction of PHI and IIHI, including electronic and paper information, is predicated on the California Labor Code, California Code of Regulations 9792.11 (r). As such, RehabWest will retain electronic files no less than 3 years' post case closure as required by CCR 9792.11 (r).

RehabWest's uses PHI and IIHI to set up injured employee case files within our proprietary system, iRWI. The PHI and IIHI is securely stored within iRWI, based on the retention schedule above, for future reference as needed.

Throughout RehabWest's service departments, PHI and IIHI is used to determine medical history, evaluate medical necessity of treatment request(s), monitor recovery and assess treatment plans, and coordinate employment status, as applicable. For all departments, PHI and IIHI aids our clinical team in evaluating the historical and current medical history of each injured employee.

Finally, PHI and IIHI helps each of RehabWest's departments communicate with providers, claims administrators, injured employees, and other appropriate parties in the facilitation and coordination of care.

### **2. Security of PHI and IIHI:**

RehabWest requires that employees, contractors, volunteers and committee members preserve the confidentiality of PHI and IIHI. The IT Manager is responsible for ensuring that RehabWest's workforce understands their responsibility to preserve the confidentiality of PHI and

IIHI. The IT Manager is also accountable for the processes to securely maintain the electronic data stored in iRWI that contains PHI and IIHI.

Additional efforts are taken to minimize the risk of disclosures of secure and confidential information by delegated contractors and vendors who handle PHI and IIHI. For contractors and vendors, RehabWest includes security provisions within the written agreements that bind RehabWest to the party in question.

RehabWest mitigates the possibility of disclosing secure and confidential information by limiting personnel access to iRWI. Each user of iRWI is assigned designated roles. These roles dictate the specific information they are privy to, and to which they are granted access. Their limitations are based on their job function assignment(s) at RehabWest.

Finally, the IT Manager is responsible for complying with information confidentiality and security, and is required to report unauthorized disclosures.

### **3. Access to PHI and IIHI**

PHI and IIHI is accessed by RehabWest employees whose job duties and responsibilities establish a need-to-know classification. All such employees have been trained in information security and confidentiality and understand that protecting PHI and IIHI is of the utmost importance.

All employees throughout RehabWest's service departments are trained on how to securely handle PHI and IIHI as it relates to their specific job duties.

### **4. Oral, Written or Electronic Communication and Transmission & Storage of Records**

- **Oral Communication and Transmission:**

Oral communication is conducted in the restricted section of RehabWest's corporate office only in the presence of coworkers. Staff working remotely conduct business in a private area where their conversations cannot be overheard.

- i. Verbal identification and authentication:

When injured employees, injured employee representatives, treating physicians, or claims administrators call RehabWest

for additional information, the staff member answering the call will verify the following information with the caller:

1. Injured employees first and last name;
2. Internal number assigned to the injured employee within iRWI; and
3. Injured employees claim number as issued by the workers' compensation claims administrator.

This information is required prior to the communication of information containing PHI and IIHI.

- **Written Communication and Transmission:**

RehabWest administrative personnel mail various correspondences to applicable parties via United States Postal Services (USPS). Such correspondences include requests for additional information and UR determination letters, as examples. Written correspondences are mailed to providers, injured employees and their representatives, and other parties that have a need-to-know, as applicable. RehabWest staff are responsible for placing outgoing mail in a locked and secured outgoing mail receptacle at the corporate office. All paper correspondence is mailed daily.

- **Electronic Communication and Transmission:**

RehabWest utilizes three forms of electronic communication of PHI and IIHI: email, facsimile and secure data exchanges.

- i. Email: RehabWest's email is hosted and encrypted by Google Business. Data in transit is encrypted with Transport Layer Security (TLS) by default. If required by client contract, rules within Google Gmail are enforced to prevent mail from being delivered unencrypted. Email communication is limited to our communication with our clients (claims administrators).
- ii. Facsimile: Correspondences are distributed to applicable parties via facsimile. Such correspondences include UR determination letters and requests for additional information, as examples.
- iii. Data feed: RehabWest transmits information to applicable parties via secure file transfer protocols (SFTP) and electronic data interchanges (EDIs). The recipients of transmitted

information include workers compensation claims administrators and medical bill review companies that have been externally contracted by our clients. Data transmitted via SFTP and EDI is retrieved hourly or daily by the receiving party.

- **Storage:**

- i. Paper Records:

- 1. RehabWest ensures that all paper records containing PHI and IIHI are stored in locked cabinets. Access to these documents is highly restricted. Unneeded paper records are shredded using a cross-cut shredder.

- ii. Electronic Records:

- 1. iRWI is web-based, therefore, data does not need to be stored on laptops, scanners, portable devices, or computers. Users can access all stored data upon logging into their iRWI account.
    - 2. All data is stored in a data center on a dedicated server that is hosted by Newtek. The entire database is encrypted via BitLocker.
      - a. Encryption of servers: iRWI database and electronic files are encrypted at rest.
      - b. Vendor servers: Newtek is RehabWest's vendor for server hosting and maintenance. Data at rest is encrypted via BitLocker.
      - c. Equipment: Staff employed at headquarters utilize company-owned and encrypted computers. Telecommuters that are employees of RehabWest's Utilization Review department are provided encrypted computers.
    - 3. All employees are provided an individual Google Drive (Cloud) account that is linked to their Gmail. This is used for data storage and is encrypted by Google Business.

**5. Links**

<http://rehabwest.com/>: Note is made that RehabWest's website contains links to other sites. Please be aware that RehabWest is not responsible for the privacy practices, other practices or contents on the other sites. We encourage our users to be aware when they leave our site, and to read the privacy policies of each and every website that collects PHI and IIHI.

**6. Questions**

Questions concerning RehabWest's Notice of Privacy Practices or its contents should be directed to the IT Manager.