

POLICY ON THERAP USAGE

Applicability: This policy applies to all Oak Hill employees who have access to or use Therap.

I. Overview.

In 2009, Oak Hill began moving many of its program-participant records from paper to Therap, a web-based software program. Therap enables Oak Hill to maintain, store and update records and reports about its program participants in an electronic, HIPAA-secure environment. At this time, Oak Hill uses Therap to keep the following data on our program participants: medical and health-related information (e.g., vital signs, weight, seizures), participant-specific and program-specific communications through “T-Logs” and “S-Comms” (a Therap-based secure communications feature), incident reports (General Event Reports – “GERs”) rehabilitative data and billing information.

II. Usage.

All employees who are responsible for keeping and reviewing data for our program participants will be given a Therap account. Employees must create their own passwords and keep them confidential.

Therap is to be used exclusively for programmatic purposes. All entries, whether in “T-Logs”, “S-Comms” and other forms and narrative sections must relate to a program participant or the operation of a program location. S-Comms are email-like communications within the Therap environment. Messages may only be sent from one Oak Hill Therap user to other Oak Hill Therap users. S-Comms may not be used for personal reasons. When using Therap, and especially when writing “T-Logs” and “S-Comms”, all users must comply with Oak Hill’s policies on: Standards of Conduct and Workplace Behavior; Sexual and Other Forms of Discriminatory Harassment; Confidentiality and Privacy; and Computer and Internet Use. All content is stored on Therap’s system and may be subject to subpoena in the event of litigation. Misuse of the technology, including inappropriate content, may result in disciplinary action up to and including separation from employment.

III. HIPAA Privacy

Therap is a HIPAA-compliant electronic record-keeping environment by which Oak Hill users, parents and guardians may enter and view private health-care related information regarding our program participants. In order to maintain this HIPAA secured environment, employees may not print, export, download or copy (whether on paper or electronically) any Therap records without express authorization from a supervisor or nurse. Managers, supervisors, clinicians and all employees who may work from remote

locations must take care to ensure that program participant information is not viewed or accessed by third parties. Violations of the HIPAA privacy and security provisions may subject Oak Hill *and the user* to significant civil monetary penalties imposed by the federal government.

IV. Use of Therap and Work Hours

Because Therap is a web-based system, it can be accessed from any computer with internet access. Accessing Therap, whether for viewing data or entering information, is a form of work. For that reason, hourly employees may not access Therap outside of their programs and regular working hours without express prior authorization from a supervisor. Furthermore, employees who are on work restriction for any reason must not access Therap until and unless they return to duty. The accounts of employees who are on administrative leave will be deactivated for the period of the leave. Unauthorized access of Therap outside of working hours or while on work restriction may be subject to disciplinary action, regardless of whether unauthorized overtime is accrued.

V. Monitoring and Auditing of Therap Documentation

Consistent with its policies on Computer and Internet Use, Electronic Mail, Laptops, and Confidentiality and Privacy, Oak Hill reserves the right, at all times, to monitor and audit the information entered into the Therap system, including "S-Comms". The use of Therap is exclusive to Oak Hill and therefore employees have no privacy interests in any content entered into the Therap system. Content that violates any Oak Hill policies may result in disciplinary action up to and including separation from employment.

This policy was approved on December 23, 2009

This policy is effective January 4, 2010

Cross-reference: Computer and Internet Use
 Confidentiality and Privacy
 Electronic Mail
 Laptop
 HIPAA
 Privacy Protection Policy
 Sexual and Other Forms of Harassment
 Standards of Conduct and Workplace Behavior