

Span, Inc. Policies and Procedures for Ensuring the Security and Privacy of Participants' Confidential Information

Span, Inc. gathers and uses certain Personally Identifiable Information and Personal Health Information in its home-delivered meal program, congregate meal program and Title IIIB transportation program. This notice explains what information we collect, why we collect the information, how we use the information, how we keep the information safe, and your rights as a participant in our programs.

What information do we collect?

Span, Inc. collects Personally Identifiable Information such as names, addresses, phone numbers, dates of birth, emergency contact names and phone numbers. It also collects Personal Health Information such as medical conditions, medications, and doctors' names and phone numbers.

Why do we collect and use this information?

We collect Personally Identifiable Information and Personal Health Information for three reasons: 1) to help determine eligibility for programs and services, either through our agency or another agency; to 2) to help arrange programs and services, either through our agency or another agency; and 3) to satisfy reporting requirements for our funding agencies. Our primary funding source is the Texas Department of Program and Disability Services and the North Central Texas Area Agency on Aging.

What limits are there on the information we collect, maintain, and make available to others?

In most cases we must get your permission before we collect, maintain, and share any Personally Identifiable Information and Personal Health Information. In most cases you must give us authorization—either verbally or in writing—before we can use your Personally Identifiable Information. In most cases you must give us written permission before we can use your Personal Health information. The major exception to these policies occurs when we have reason to believe that an older person, person with a disability, and/or child is being abused, neglected or exploited. In such cases we are obligated to make a referral to the Texas Department of Family and Protective Services.

If you give us written permission to use your Personally Identifiable Information and/or Personal Health Information, you can limit our permission. For example, you can allow us to release your information to only the individuals or entities you specify, or you can allow us to release the information to any individual or entity that might be able to help you.

What responsibilities do we have for protecting your Personally Identifiable Information and Personal Health Information?

We are required by law to safeguard your Personally Identifiable Information and Personal Health Information. We do this in at least two ways:

1. Share Personally Identifiable Information and Personal Health Information only as you have authorized, with people who have a need to know.
2. Keep your records safe from people who don't have a need to know. For example, we keep our paper records with Personally Identifiable Information and Personal Health Information in locked cabinets and offices. We use secure emails when sending Personally Identifiable Information and Personal Health Information.

What rights do you have regarding our use of your Personally Identifiable Information and Personal Health Information?

You have a right to review your Personally Identifiable Information and Personal Health Information we have gathered and maintained.

If the Personally Identifiable Information and/or Personal Health Information we have is not correct, you have the right to correct any inaccurate information.

You have the right to more information about our privacy policies. You also have a right to complain about our privacy policies. For more information or to make a complaint, contact:

James C. Campbell

Compliance & Grants Manager

jamesc@span-transit.org

(office) 940-382-2224