

CSP Privacy Policy & COVID-19 Response

The need to communicate and share data is especially important during the current COVID-19 pandemic. However, we need to make sure we follow the appropriate guidelines for sharing protected personal information (PPI) with agencies who do not have an agreement with CSB. The below guidance is consistent with our current privacy policy.

Disclosures required by law:

A partner agency may use or disclose PPI when required by law to the extent that the use or disclosure complies with and is limited to the requirements of the law. For example, disclosure of PPI to a public health authority is permissible under any federal, state, or local public health reporting law.

Disclosures to avert a serious threat to health or safety:

Uses and disclosures to avert a serious threat to health or safety. A partner agency may, consistent with applicable law and standards of ethical conduct, use or disclose PPI if:

- 1) The partner agency, in good faith, believes the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public; and
- 2) The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.

The authority to disclose PII is not unlimited:

If a healthcare provider or public health authority does not seek or require client names when asking for information, then the names should not be disclosed. If it is sufficient to give adequate notice to a healthcare provider or public health authority without disclosing the names of one or more clients, then it would be appropriate not to disclose the names. Staff should still take steps, when possible, to inform clients of disclosure.

If you have questions about this guidance or specific scenarios, please reach out to CSB Database Administrator, Travis Theders, at ttheders@csb.org.