

CONFIDENTIALITY-EMPLOYEE STANDARDS

County Policy MP-1 [..\MP\MP-1- Confidentiality.doc](#) covers the safeguarding and release of information gathered and retained during the economic assistance eligibility determination and case management processes.

County Policy MP-12A [..\MP\MP-12A- Confidential \(yellow or red\) File Policy- procedure.doc](#) covers the safeguarding of sensitive written records/files.

This policy addresses the personal responsibility of all Division employees to maintain the highest ethical standards for safeguarding information about applicants and clients. This includes oral, written, and electronic information.

I. Professional Behavior

All employees are expected to demonstrate professional demeanor, helpful and courteous behavior toward customers, co-workers and the public 100% of the time. This includes the responsibility to maintain the strictest level of confidentiality of personal information known about others.

- Sharing of information about applicants and clients and their case files is limited to disclosure allowed under Wisconsin law, and various State departments' rules and directives. This includes sharing of information with any third parties. Under no circumstances should employees share information they have about applicants and clients with persons outside of their work responsibilities or make use of this information for their personal use.
- Access to case information is limited to employees who must have access for the purposes directly related to processing and maintenance of the case. Employees shall not discuss or share case information with others unless it is necessary and relevant to the administration of the case.
- Economic Support Supervisors, Lead Workers, and Economic Support Specialists will not have direct responsibility for managing a case including any relative, close friend or acquaintance. It is the responsibility of the employee to alert their immediate supervisor of this possible conflict of interest so that the case can be transferred to another employee or work unit.
- Employees will only solicit information from applicants and participants that is essential to providing services.
- Employees will not discuss client information in any setting unless privacy can be insured.
- No information about applicants or clients should be shared with the media. All questions from the media should be directed to your Department Director or Deputy Director. Information to the media is released only under the direction of the

Department Director or Deputy Director. Notify your Supervisor of any media requests that you forward to the Department Director or Deputy Director.

- Generally client records may not be taken from agency offices for any purpose without a court order. Follow guidelines in MP-1, Confidentiality, if there is a subpoena for records. For case administration purposes, case records may be transported between field offices by DCDHS staff. Case records may not be taken home for any reason. Any time a record must be removed from the agency, the worker responsible for that record must exercise the utmost care to ensure that confidentiality is maintained at all times.

II. Coding cases confidential in CWW

Cases coded confidential in CWW can only be accessed by the assigned worker, and the worker's supervisor. At some times other Supervisors and the Associate Division Manager have been able to access them, but this is rare. When a case is coded Confidential no one else at the local level can even access a screen to tell them who the assigned worker is.

For a case to be coded as confidential in CWW one of the following criteria must be met:

- The case must include someone who is a domestic abuse victim and the person states that she has reason to believe the abuser could find her if the case was not confidential.
- The case includes someone in the Witness Protection Program and they request that the case be confidential.
- The case includes someone who works for Dane County Human Services or works in JCO or STO, or their immediate family works for DCHS or in one of these offices and the client requests that the case be held confidential.
- The case includes someone who is a friend or acquaintance of someone who works for the Division of Economic Support and Work Services and the client requests that the case be held confidential.
- As determined by the unit Supervisor for customers who work at the ESC, Member Services, or other related agencies.
- As requested by the Fraud Investigator.

Designations of confidential cases must have supervisory approval and the continued need to have the case confidential should be determined by the ESS at review.

The supervisor will document on CMCC when a case is designated confidential, the date and the reason.