



Social Services Block Grant Client Confidentiality

Policy 14.11

Effective: December 15, 2023

Introduction

Agencies that contract with the Tennessee Department of Human Services must maintain client confidentiality.

Scope

The reason for this policy is to document requirements surrounding client confidentiality.

Policy

Maintaining Client Confidentiality

1. All Tennessee Department of Human Services (TDHS) employees and Social Services Block Grant (SSBG) providers must maintain strict standards of confidentiality regarding client identity and case information.
2. All material, regardless of form, medium, or method of communication is considered confidential in accordance with state regulations and professional ethical standards.
3. Client records must be stored in a secure location regardless of medium. Physical records must not be removed from agency grounds and electronic records must be protected at all times.

Government Access to Client Information

When necessary, state and federal employees must be allowed to access client case information. At initiation of services, provider agency staff must inform all clients that their case records are subject to review by state

and federal employees. Clients are to be reassured that both state and federal employees are obligated to maintain client confidentiality. SSBG is unable to provide services to clients who choose not to allow appropriate government review of their case information.

Release of Client Information to Third Parties

1. Sometimes a client will request their SSBG agency share confidential information with a third (3rd) party. Examples include but are not limited to medical personnel and family members assisting with care.
2. Client approval must be renewed, documented, signed, and dated in the semi-annual [hs-3476 SSBG Social Assessment and Service Plan](#). If, for any reason, the client cannot sign their name, their mark must be witnessed by a non-interested party. The Assessment and Service Plan must indicate the person or organization to whom the information should be released and specify the type of information to be shared (e.g., medical, financial, case status, etc.).
3. All clients must be informed that they can revoke a Release of Information (ROI) at any time. Agencies must provide the client with a mechanism for documenting the revocation between assessments.

Supporting Documents

[hs-3476 SSBG Social Assessment and Service Plan](#)

Definitions/Acronyms

Term	Definition
ROI	Release of Information
SSBG	Social Services Block Grant
TDHS	Tennessee Department of Human Services

Supersedes

Social Services Block Grant Client Confidentiality, eff date 03/15/2021

Approval History

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Approved By	Approver Title	Approved Date	Effective Date
Clarence Carter	Commissioner	12/03/2023	12/15/2023
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Revision History

Date	Version	Location of Change	Description/Reason for Change
12/03/2023	12/15/2023	Policy Section	Updated title of section for transparency added requirement of reviewing access to the client's information as circumstances evolve.
03/10/2021	03/15/2021	N/A	New Policy

Approved By	<i>Clarence H. Carter</i>	Approval Date	12/03/2023
Authority	Tenn. Code Ann. § 71-6-118 45 CFR 96.70 et seq. [Social Services Block Grants] 42 CFR §§1397.	Effective Date	12/15/2023
Application	SSBG employees and provider staff.		