

Guidance on Client Confidentiality and Food Purchases

The following are Department expectations concerning supporting information entered in the State's Accounting system, FINET, for support of financial transactions:

Client Confidentiality

- **NO** client identifying information (client names, initials, addresses, ID numbers, etc.) should be entered into FINET due to client confidentiality. There may be additional expectations because of HIPAA in your division, which should be followed.

You should use information such as invoice number, RX number, or date of service to assist the vendor to properly identify your payment. You may want to include your name and phone number as a contact in the line description for payment questions.

- Employee names are not confidential. Do not include employee home address information, Social Security Number, or any information other than what is automatically included in payment processing in FINET.
- When creating ITI's, ITA's, or IET's to bill for client services, work between offices to appropriately communicate information to support the transactions. You may include information such as number of clients, region, office, or level of service information without including any specific client information.
- When attaching scanned backup documentation in FINET, ensure that no confidential information is included. If confidential information is required for payment support, you can scan a note indicating further information exists and reference where it is located. You will need to keep the confidential information secured and retained according to the document retention requirements.

Food Purchases

- Please see all existing budget restrictions when considering a food purchase. In the event that food purchases are allowed, obtain all necessary approvals including EDO and Division Director. If the food purchase is approved, the supporting

documentation must explain the reason and use of the food regardless of payment method (FINET, P-card, etc.). After a food purchase has been properly justified and approved, the following supporting documentation must be included:

- Meeting agendas, if applicable, should be included to help provide support for reason and use of food purchase.
 - A list of attendees or participants documenting who received the food benefit. If participants include clients, other general descriptions should be used such as a number for clients and responsible employee. No specific client identifying information should be included in the support.
 - EDO/Division Director approval as required.
- Documentation should support that the purchase/reimbursement is reasonable and prudent use of taxpayer funds.
 - Applicable state/department policies and procedures should also be followed.