



PRIVACY AND CONFIDENTIALITY POLICY

HIPAA-Inspired Standards for Client Information

Purpose

Covered Journey Transportation Co. is committed to protecting the privacy and confidentiality of the personal, medical, and behavioral information entrusted to us by Clients and their families. While Covered Journey Transportation Co. is a transportation provider and not generally a “covered entity” under the Health Insurance Portability and Accountability Act (HIPAA), we voluntarily adopt privacy and security practices inspired by HIPAA standards to protect Client information.

Information We Collect

- Identifying information (name, date of birth, address, contact information)
- Diagnosis-related and disability-related information relevant to safe transportation
- Medication, allergy, and emergency medical information
- Behavioral support information, including triggers and calming strategies
- Funding source and service authorization information
- Incident reports and trip records

How We Use Information

- To plan and provide safe, individualized transportation services
- To communicate with parents, guardians, support coordinators, and day programs about scheduling and care
- To respond to emergencies
- To bill private-pay clients or applicable funding sources
- To comply with legal, licensing, or regulatory requirements

Who We Share Information With

We share Client information only as necessary, and only with:

- Covered Journey staff directly involved in providing or supervising the Client's transportation



- The Client's support coordinator, case manager, or waiver program representative, for service coordination and billing
- The Client's day program, school, or therapy provider, as needed to coordinate pickup, drop-off, and safety needs
- Emergency medical personnel or law enforcement, when necessary to protect health or safety
- As otherwise authorized in writing by the Client Representative, or as required by law

We do not sell Client information, and we do not share Client information for marketing purposes.

Client and Family Rights

- You may request to review the personal and medical information we maintain about the Client.
- You may request corrections to inaccurate information.
- You may request a list of certain disclosures of the Client's information made outside the ordinary course of providing transportation.
- You may file a complaint about how the Client's information has been handled by contacting our office directly.

How We Protect Information

- Paper records are stored in locked or access-restricted locations.
- Electronic records are stored using access-controlled systems, limited to staff with a legitimate need to know.
- All employees and drivers sign confidentiality agreements and complete training on privacy expectations before working with Clients.
- Information shared with drivers is limited to what is necessary to safely transport the Client.

Record Retention and Disposal

Client records are retained for as long as necessary to provide services, meet legal and funding source requirements, and support continuity of care, and are securely disposed of (shredded or permanently deleted) thereafter.

Reporting a Privacy Concern or Breach

If you believe Client information has been used or disclosed improperly, please contact us immediately at (347) 902-6316 or support.coveredjourney@gmail.com. We will investigate



COVERED JOURNEY TRANSPORTATION CO.

Where Every Journey Is Covered With Care

promptly and take appropriate corrective action, and will notify affected families consistent with applicable law if a breach involving their information occurs.

Policy Updates

This policy may be updated from time to time to reflect changes in our practices or applicable law. The most current version will be made available to families upon request.

Parent/Guardian Acknowledgment Signature

Date

Date

Date