	Department: Corporate Compliance	Policy No.: 105
	TITLE: PATIENT CONFIDENTIALITY	
Effective Date: 1/1/15	Revised: 1/1/15	

PATIENT CONFIDENTIALITY

SCOPE:

All Ascension At Home, LLC colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.


PURPOSE:

To provide guidance for all Ascension At Home, LLC and its subsidiaries’ (the “Company”) colleagues on protecting patient privacy. This policy shall govern the disclosure of any patient information to anyone other than Company personnel involved in: (1) the care and treatment of that patient, or (2) billing for services rendered by the Company to the patient. Any personnel who engages in the unauthorized disclosure of any information concerning a patient may be subject to immediate termination.

POLICY:

All Company colleagues are required to comply with the following guidelines:

- Colleagues shall take reasonable steps to limit any incidental disclosures of protected health information (PHI) in an external or internal environment (such as discussing a patients PHI in front of family members) where individuals not involved in the patient’s care could hear such information.
- Colleagues of the Company will not use or disclose PHI for purposes other than treatment, payment or healthcare operations (TPO) without first obtaining a written authorization from the patient or the patient’s legal guardian or personal representative.
- The Company will establish reasonable safeguards to protect and limit access to all computerized or hardcopy records of PHI. Access of PHI shall be limited to the minimum amount necessary to fulfill one’s job function. In addition, the Company will establish procedures to limit uses and disclosures of PHI for purposes other than treatment to the minimum amount necessary to fulfill the request.
- All documents containing identifiable patient information, such as name, social security number, address, etc., must be stored or disposed of in a secure fashion. All

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computerized systems containing identifiable patient information must have appropriate safeguards, including, but not limited to passwords to limit access to only those Company colleagues who need the information to perform his or her job function.

The Ethics & Compliance Department has developed a comprehensive set of HIPAA policies and procedures that will provide you with additional guidance related to the HIPAA Privacy and Technical Security Rule.