

TITLE: Confidentiality of Patient Information Policy

Category: Privacy and Security	
Original Effective Date: 12/10/07 Revision Date:	Review Date: November, 2008

PURPOSE:

This Policy applies to all Participants and their authorized users, as well as to employees and agents (e.g., contractors, trainees, volunteers) of ACCEL that receive access to ACCEL systems and services containing health and other identifying information about individual patients or beneficiaries (“patients”). Each person receiving access to the ACCEL systems and services is referred to below as a “User,” and collectively as “Users”. If a User receives access because of his or her affiliation with a hospital, medical group, or other organization participating in ACCEL, such organization is his or her “Participant.”

Users deal with highly confidential information concerning patients made available through ACCEL. Repeated exposure to such information may lead to a decreased sensitivity to the need to protect patient privacy and to avoid unauthorized disclosures. This policy statement serves as a reminder to all Users that patient-identifying information is generally to be maintained in confidence and not disclosed.

POLICY

It is the policy of ACCEL and its Participants to maintain the privacy and the confidentiality of patient information. All Authorized Users are expected to act at all times in compliance with this Policy, during both working and non-working hours. Violations of confidentiality may be cause for (1) reporting by the Participant and/or ACCEL to appropriate authorities, (2) alteration or termination of User’s relationship with Participant and/or ACCEL, (3) reduction or termination of access to information about patients, (4) personal liability for damages, and/or (5) fines or imprisonment under federal and state laws protecting the confidentiality of patient information.¹ If you have any questions, you should direct them to the Privacy Officer for your Participant or ACCEL.

What information is covered

Any information implicitly or explicitly identifying any individual as a patient or beneficiary is confidential. This includes not only medical records, diagnoses, and treatment information, but also the very identity of a person as a patient. All forms of communication are included (oral, written, and electronic).

When disclosure may be made

Patient-identifying information must not be disclosed except in accordance with Participant’s and ACCEL’s privacy and security policies and procedures. If you have questions, ask the Privacy Officer for your Participant or ACCEL.

Precaution

Patient identified information from ACCEL Systems cannot be transmitted via email.

¹ Penalties under HIPAA go up to \$250,000 in fines and jail time of 10 years. Other fines and penalties (e.g., regarding identity theft) may exceed these amounts