

POLICY NUMBER: Policy #2/0044/R1

POLICY TITLE: Confidentiality

POLICY STATEMENT: To protect the confidentiality of all information obtained during the credentialing process and to maintain confidentiality of all practitioner/provider specific information.

****Effective/Review/Approval dates reflect those of Policy #2/0030/R2 – Practitioner Credentialing, Recredentialing and Hearing Policy & Procedure****

EFFECTIVE DATE: 3/93

REVIEW DATE: 12/98 annual review; 5/99 revisions; 8/99 revisions, 11/99 revisions & annual review, 12/00 revision & annual review, 9/02 annual review, 10/02 annual review, 10/03 annual review, 10/04 revisions & annual review

STATUS: Existing policy

APPROVAL COMMITTEE/DATE: Credentialing Committee Annual Review: 12/3/97, 12/2/98, 11/3/99, 12/6/00, 9/04/02, 10/1/02, 10/1/03, 10/6/04

Revisions: 5/5/99; 8/4/99, 11/3/99, 12/6/00, 10/6/04

DISTRIBUTION/SECURITY: All staff/No security required

AUTHOR(S): Credentialing Committee

BACKGROUND: Formerly part of Policy #2/0030/R3 – Practitioner Credentialing, Recredentialing and Hearing Policy & Procedure.

POLICY DESCRIPTION:

Priority Health will treat information it receives and maintains as part of its credentialing and recredentialing activities as confidential in order to maintain protection under Michigan and Federal Peer Review Protection Laws. Priority Health will not disclose information to individuals who are not members of the Credentialing Committee, the Quality Integration Committee or the Board of Directors, except as permitted or required by supporting Credentialing Policies and/or procedures or as required by State or Federal statutes, regulations, or judicial order. Priority Health will maintain all Quality Integration Committee and Credentialing Committee documents in a secure manner in Priority Health's Credentialing Department.

Priority Health will exercise due care with practitioner/provider specific information by keeping all practitioner/provider files locked and in a secure area. Priority Health staff will not disclose practitioner/provider confidential or protected information to parties outside of the organization unless required by law in which case Priority Health Legal Counsel will be involved. Direct access to practitioner/provider files is limited to Credentialing team members. Other Priority Health personnel who are members of the Credentialing Committee, Priority Health Legal Counsel and Credentialing Committee members will have access to practitioner/provider files via a Credentialing team member.

Priority Health Credentialing Committee minutes do not identify practitioners by name but reference practitioners through a numbering system. All Priority Health employees sign a Confidentiality Statement upon employment. In addition, all Credentialing Committee members are required to sign a Confidentiality Agreement.

Priority Health Credentialing department will maintain the complete file of all providers for a minimum of twenty (20) years following termination from Priority Health. Terminated provider files will be maintained on-site at Priority Health in the Credentialing department for the first two (2) years following termination. Files of providers who have not been with Priority Health for over two years will be sent to Kent Records for confidential storage with a destroy date of 20 years.

SUPPORTING DOCUMENTATION: Credentialing Overview Policy #2/0039/R6, NCQA Standard CR 1, Priority Health Confidentiality of Medical Information, Confidentiality Agreement with Third Parties

OPERATIONAL AREAS IMPACTED: Credentialing

SPECIAL NOTES (I.E., PRODUCTS AFFECTED): This policy applies to all products.