



 Winson Memorial Hospital We Care For You	<u>Effective Date</u>		
	July 2007		
	<u>Number</u> HP 008	<u>Replaces Policy</u> NEW	
<u>Title</u> Community Clergy Access to Patient Listings Under the HIPAA Privacy Standards	<u>Date Revised</u> July 2007	<u>Date Reviewed</u>	<u>Next Scheduled Review Date</u> July 2010
<u>Signature</u> _____	<u>Scope of Responsibility</u> HIPAA/Compliance		
Chief Privacy Officer			

Purpose: To facilitate compliance with the Health Insurance Portability and Accountability Act (HIPAA), Standards for Privacy of Individually Identifiable Health Information (Privacy Standards), 45 CFR Parts 160 and 164, and all Federal regulations and interpretive guidelines promulgated thereunder. To establish guidelines regarding clergy access to facility directory information.

Policy: The following are requirements for releases of directory information and patient listings to community clergy under the HIPAA Privacy Standards.

This policy is based upon the HIPAA Privacy Standards, 45 CFR section 164.510 - Uses and Disclosures Requiring an Opportunity for the Individual to Agree or to Object. This policy requires covered health care providers to inform an individual of the protected health information (PHI) that it may include in a directory and the persons to whom it may disclose such information, including disclosures to clergy of information regarding religious affiliation, and provide the individual with the opportunity to restrict or prohibit some or all of the uses or disclosures.

IMH clergy who are part of the patient care team may have access as part of the IMH team.

Procedure:

1. **Verification of Clergy Members**
 - a. A process must be put in place to verify community clergy members.
 - b. Community clergy should be given a badge or other identification from the facility.
 - c. Each clergy member must be asked to show the facility ID badge and a driver's license (or other picture ID) before being given access to any patient lists.

Policy:

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2. ***Releases to Clergy Members***

Unless a patient is a confidential patient or has requested to opt out of being listed in the facility or clergy directory, members of the clergy will be provided with the following information:

- a. Name of Patient;
- b. Condition in general terms; and
- c. Location / Room and Bed number.

IMH Admitting must notify each patient of his or her right to opt out of being listed in the facility and clergy directory via the Notice of Privacy Practices. To invoke this right, the patient will need to request to opt out. When a patient opts out, he or she must be suppressed from any general clergy listings released.

If the patient, during the nursing assessment, asks for his or her clergy to be notified, the nursing staff should handle notification.