Policy Statement:

The Privacy Rule provides that Renown may maintain in a directory the following information about individual patients: the individual's name, location in the facility, general medical condition (i.e., fair, serious, etc.), and religious affiliation. Renown will provide a mechanism for the patient to object to such use, including disclosures to clergy of information of religious affiliation, and will provide the patient with the opportunity to restrict or prohibit some or all of the uses or disclosures provided in this policy. In order to comply with The Joint Commission (TJC) standards for providing patient access to pastoral counseling, patients are asked if they want to indicate their religious affiliation. When indicated, that information is available only to members of the clergy and authorized chaplaincy representatives.

Definition of Terms:

1. Directory – Record containing a list of individuals in Renown Health facilities which includes the patient's name, location and general condition. When the patient provides their religious affiliation, the directory also includes this information.

2. TJC – The Joint Commission

3. Workforce Member – Employees, volunteers, trainees, medical staff, residents and other persons whose conduct, in the performance of work for Renown Health, is under the direct control of Renown, whether or not they are paid by Renown.
1. At the time of registration, a patient will be given the opportunity to agree or object to the use and disclosure of their directory information.

2. Registration staff may use the following script.
   “Our facility directory contains patient name, location (i.e., department, room/bed number), general medical condition (i.e., fair, serious), and religious affiliation (when indicated by the patient). You have the right to agree or object to the use and disclosure of your directory information.
   
   a. May we release your location and general medical condition to others who ask for you by name?
   b. If you indicate a religious affiliation, may we release your name and directory information to members of the clergy and the chaplain office?”

3. If a patient requests to be excluded from the directory, they will be asked to sign an Election to be listed in or to Opt Out of Facility Directory form.

4. If the opportunity to object to uses or disclosures required by the above paragraph cannot practicably be provided because of the individual's incapacity or an emergency treatment circumstance, Renown Health may use or disclose some or all of the protected health information permitted above for the facility's directory, if such disclosure is:
   
   a. Consistent with a prior expressed preference of the individual, if any, that is known to the covered health care provider; and
   b. In the individual's best interest as determined by the covered health care provider, in the exercise of professional judgment.
   c. The covered health care provider must inform the individual and provide an opportunity to object to uses or disclosures for directory purposes as required by the preceding paragraphs when it becomes practicable to do so.

5. Each workforce member with treatment, payment or health care related responsibilities is responsible for compliance with these policies and principles.

6. The Chief Compliance and Privacy Officer has the responsibility of facilitating compliance with these procedures.

7. Enforcement will be consistent with Renown Health’s Code of Conduct and Renown Health Human Resource Coaching and Corrective Action Policy RENOWN.HRM.810.

References/Regulations:

45 CFR §§164.510(a)
## RENOWN.HRM.810 Coaching and Corrective Action
The Joint Commission Standard: RI.01.01.01 Element 9

### Contributors:
- Brian Colonna, HIPAA Privacy Coordinator
- Drew Williamsen, Manager of Compliance