

**Policy on Disclosure of Program Information
ALL Program**

Policy and Procedure

Subject	Number	Date Issued	Date Revised	Date Effective
Policy on Disclosure of Program Information	T004_ALL	6-15-2017	6-15-2017	6-15-2017
Originated By:		Approved By:		
Jonathan Ciampi		Lois Zsarnay		

Purpose: The Policy on Disclosure of Program Information is designed to protect patient confidentiality and intellectual property. This policy outlines information that may not be shared without consent from the CEO, Medical Director, Clinical Director, or Program Director. With the success of Bright Heart Health, many organization and press will look to copy, smear, or discredit the organization. This policy ensures staff do not share information without approval.

Policy:

If asked by anyone outside the organization regarding the program beyond services provided to an individual, staff should follow these guidelines:

Identification of caller:

- Reporters, competition, and other groups often do not reveal their identify during calls. In some cases, he or she may indicate they are looking for services. Be mindful that anyone may be requesting this information (e.g., “Hi, I was looking for treatment. How many patients do you have?”).
- In addition, common tactics are to use urgency, fear, or privacy as a reason to share. (“I am just wondering, I promise not to share with anyone.”)

Questions/Information Not to be Disclosed:

- Total number of patients
- Cost of treatment/reimbursement from insurance (e.g., “How much does Cigna pay you for this service”)
- Patients in a state, city, region (e.g., “How many patients do you have in New York?”)
- Policy or Procedure related (e.g., “How do you do drug screens?”)
- Total Physicians, Therapists, Staff (e.g., “How many physicians do you have?”)
- Patient Information – we never share information on a patient or disclose if the patient has seen us, called us, admitted, or is receiving services. Please forward requests to Ashley Ganem or Jonathan Ciampi.
- Accreditations (e.g., “how did you get your Joint Commission accreditation?”)