

*System – Administrative*

**TITLE:**

Confidentiality

**OUTCOME STATEMENT:**

To outline expectations of confidentiality for all employees of SSM Health (“SSM”).

**SCOPE:**

This policy is applicable to all SSM hospitals\*, Physicians’ Organizations, and operating entities including their employees, agents and medical staff, as well as employed physicians of an SSM Medical Group.

**FILE MAINTENANCE INFORMATION:**

Original Effective Date:	09/08/1998
Revision Dates:	06/30/2005, 02/19/2016
Review Dates:	
Author(s):	Rachelle Barina, System Manager Ethics
Body or Person Last Approved:	Mike Panicola, Senior Vice President, Mission, Legal & Government Affairs, System Policy Board

\* As required by CMS Regulation §482.12 A-0043 Conditions of Participation: Governing Body, the following hospitals are included as SSM entities:  
**Missouri:** (1) SSM Health St. Mary’s Hospital – St. Louis and SSM Health Cardinal Glennon Children’s Hospital, (2) SSM Health DePaul Hospital – St. Louis, (3) SSM Health St. Clare Hospital – Fenton, (4) SSM Health St. Joseph Hospital – Lake St. Louis, (5) SSM Health St. Joseph Hospital – St. Charles and SSM Health St. Joseph Hospital – Wentzville, (6) SSM Health St. Francis Hospital – Maryville, (7) SSM Health St. Mary’s Hospital – Jefferson City, (8) SSM Health St. Mary’s Hospital – Audrain,  
**Oklahoma:** (1) St. Anthony Hospital and Bone & Joint Hospital at St. Anthony, (2) St. Anthony Shawnee Hospital,  
**Wisconsin:** (1) St. Mary’s Hospital, (2) St. Clare Hospital, (3) St. Mary’s Janesville Hospital,  
**Illinois:** (1) SSM Health St. Mary’s Hospital – Centralia and (2) SSM Health Good Samaritan Hospital – Mt. Vernon

**PROCESS:**

- I. Confidentiality of sensitive information is to be maintained by all employees. This includes:
  - A. Patient information
    - 1. Patient information, including information in the patient’s medical record and information gained verbally from the patient and/or patient’s family, will be protected in accordance with all applicable State and Federal laws and regulations. No patient information is to be released without legitimate business or patient care purposes (i.e. purposes of treatment, payment, or health care operations) and only with proper authorization, as required by law.
  - B. Business Information
    - 1. Confidential and/or proprietary information related to SSM Health’s ministry, business strategies, suppliers, reimbursement information, other organizations, or community groups is not to be shared without appropriate supervisor approval.
- II. Any breach of confidentiality may include, but is not limited to information about patients, employees, or operations and should be brought to the attention of a manager. Breach of confidentiality may result in disciplinary actions in accordance with SSM Health’s Corrective Action policy.
- III. Exception: Release of information in accordance with SSM policy, regulatory or legal requirements is not considered a violation of this policy.
- IV. Nothing in this policy or elsewhere is intended to prohibit communications or activity by employees regarding wages, benefits, or other terms and conditions of employment or prohibit communications that are legally protected under the National Labor Relations Act or any other applicable state or federal law.

**DOCUMENTATION:**

None.

**REFERENCES:**

None.