**Procedure and Policy Manual**

**Medical & Health Services**

| **Confidentiality Policy** |
| --- |

***The purpose of this policy is to protect the confidentiality of patient medical information within <<School>>’s Health Center. Generally speaking, medical professionals have a professional and legal obligation to maintain the confidentiality of patient information and may not disclose such information without appropriate consent.***

# Handling of Medical Information:

# **H**e**alth and medical informat**ion must be protected. **In most cases, information within the Health Center will fall into one of the four categories below, which will control how the information is handled. If you have questions as to which category appl**ies**,** speak with the Medical Director before sharing or releasing any information.

**Confidential Medical Information**

This category includes all personally identifiable medical information (except that which is restricted confidential medical information), including but not limited to medical histories, medical charts, treatment, visit, appointment, rehabilitation, and diagnosis data, patient account records, medication records and any such information contained in computer form. Within the Health Center, access is limited to medical professionals who are directly involved in the care and/or treatment of the patient.

Confidential medical information shall not be released outside the Health Center unless a fully executed Release Authorization is received, and only then in accordance with the terms of the Release. See Section II, Medical Release Authorization. The Medical Director may authorize release of confidential medical information without a release in certain extraordinary situations.

Confidential medical information should only be discussed in private areas, in a low voice, and speakers should avoid proximity to unauthorized listeners.

Confidential medical information may not be transmitted by email or other electronic means either internally or externally except by the Medical Director pursuant to appropriate consents.

If confidential medical information is distributed by mail pursuant to a Release Authorization, it shall be prominently labeled confidential and sent by a trackable delivery service.

If confidential medical information must be sent by facsimile, a cover sheet prominently labeled confidential must be attached, advance telephone notice must be provided to the recipient, and the sender must confirm receipt by the intended recipient.

**Restricted Confidential Medical Information**

This category includes pregnancy-related treatment, treatment for sexually transmitted diseases, treatment for sexual assault, drug or alcohol treatment, AIDS or HIV infection treatment, and any other highly sensitive treatment.

Access to restricted confidential medical information must be limited to as few medical professionals as possible who are directly involved in the care and/or treatment of the patent and only on a need-to-know basis. This information is extremely sensitive and should be closely controlled.

Restricted confidential medical information should only be discussed in private areas, in a low voice, and speakers should avoid proximity to unauthorized listeners.

Restricted confidential medical information may not be transmitted by email or other electronic means either internally or externally except by the Medical Director in emergency situations.

If restricted confidential medical information is distributed by mail pursuant to a Release Authorization, it shall be prominently labeled confidential and sent by a trackable delivery service.

Restricted confidential medical information may not be sent by facsimile except by the Medical Director in emergency situations. In those cases, a cover sheet prominently labeled confidential must be attached, advance telephone notice must be provided to the recipient, and the sender must confirm receipt by the intended recipient.

**School Community Information**

This category includes information that is generally available to the school community -- for example, newsletters, bulletins, notices and blank forms. There is no restriction on distribution of this type of information within the school community as appropriate.

**Internal Non-Medical Information**

This category includes non-medical correspondence, memoranda, internal policies and procedures, and demographic information. This information should only be disclosed internally to those who have a legitimate business reason to know.

# Medical Records Release Authorization

No medical records shall be released unless the parent/student-patient (if the student is 18 years old) has executed the Health Center’s Medical Records Release Authorization form. Only those records identified in the Release form shall be released to the authorized recipient. The Medical Director shall review the Release form and the medical records to be released prior to their release.

# Medical Charts[[1]](#footnote-0)

All medical charts shall be stored in the secured drawer in the nursing station when not in use. Charts may be utilized only by those who have patient-care responsibility, and may only be discussed with other medical professionals on a need-to-know basis. When retrieved for use in connection with the treatment or examination of a patient, the chart should be handled carefully to maintain confidentiality. If the chart is placed beside the door of the examination room, the chart shall be turned towards the wall so that a passerby cannot see any identifying information. Charts shall also not be left unattended for any significant period of time and, after use, the chart must be promptly returned to the drawer in the nursing station.

# Verbal Communications Concerning Student Medical Information

Confidentiality is also required for verbal communications concerning patient medical information. Verbal communications concerning patient medical information shall be made only to other medical professionals on a need-to-know basis. Conversations should take place in private areas, in a low voice, and speakers should avoid proximity to unauthorized listeners.

# Computer Data

As previously stated in this Confidentiality Policy, confidential medical information that exists on the <<Name> Health and Wellness Center computer system may not be transmitted by email or other electronic means either internally or externally except by the Medical Director pursuant to appropriate consent. Within the Health Center, access to confidential medical information is limited to medical professionals who are directly involved in the care and/or treatment of the particular patient. Confidential medical information that resides on the Health Center computer system will not be released outside the Health Center Health System unless a fully-executed Release Authorization is received, and then in accordance with the terms of the Release and within the discretion of the Medical Director. User IDs and guarded passwords will be used to ensure that only the medical professionals with a need to know will have access to confidential medical information of the patients who have been treated by those professionals. Information that is stored on the computer system and falls within the definitions of “school community information” and “internal non-medical information” (previously defined in this Policy) will be disclosed internally to those who have a legitimate business to know this information or if it is appropriate for other School business.

The provisions of this Policy that apply to non-computer confidential medical information within the <<Name> Health and Wellness Center also apply to computer data stored on the Health Center computers.

Downloading any communication or any of the confidential medical data information is strictly prohibited, unless otherwise permitted by the provisions of this Confidentiality Policy. The unauthorized copying and/or transmitting of this data is prohibited unless done so by the medical professionals directly involved and for the purpose of providing treatment, pursuant to the Release authorization, and after the review and approval of the Medical Director.

The following are prohibited under normal circumstances when dealing with confidential medical information:

1. Printing to a printer in an unsecured area or any area where the information can be seen or read by unauthorized personnel;
2. Leaving your computer unattended or unlocked when confidential information is accessed and can be observed by others;
3. Leaving computer storage devices (such as disks, CD’s, USB keys, or other formats) which contain confidential medical information unattended and accessible by unauthorized personnel; and
4. Sending confidential medical information electronically over unsecured/unencrypted communication systems without the approval of the Medical Director and IT personnel.

(Note: Any confidential medical information files authorized under this Policy for transmission to locations outside the Health Center or Medical Services must be sent as encrypted email attachments and only to known bona fide/verified email addresses).

The Medical Director reserves the right, without prior notice, to access, disclose, use or remove medical and personal computer information at his/her sole discretion.

**<<School>>**

**<<Name> Health and Wellness Center**

**Confidentiality Agreement**

By virtue of your relationship with the <<Name> Health and Wellness Center, you may have access to confidential medical information. Handling of confidential medical information is governed by the Health Center’s Confidentiality Policy, and you are responsible for following that policy. Failure to follow the policy will constitute grounds for corrective action, up to and including termination.

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, have received a copy of, read, understand and agree to comply with the <<Name> Health and Wellness Center Confidentiality Policy.

Signature:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. Separate procedural requirements for charting medical information are contained in the policy and procedure handbook. [↑](#footnote-ref-0)