

Confidentiality

Purpose

This policy provides general confidentiality guidelines for Lewiston Ambulance.

Policy

Maintaining confidentiality of patient, employee, and business information is critical.

This policy pertains to all information (oral, paper-based, and electronic) related to the operation of Lewiston Ambulance including, but not limited to:

- financial information
- patient names and other identifying information
- patient personal and medical information
- patient billing information
- employee names, including salaries and employment information
- proprietary products and product development
- marketing and general business strategies
- any discoveries, inventions, ideas, methods, or programs that have not been publicly disclosed
- any Protected Health Information as defined under the Health Insurance Portability and Accountability Act of 1996 (HIPAA)

In addition to the above, any information that has been marked "confidential" by Lewiston Ambulance will be deemed to be covered under this policy.

Unauthorized access, use, or release of confidential and sensitive information to nonauthorized individuals or entities is strictly prohibited and may result in immediate disciplinary action up to and including termination.

Maintaining confidentiality is the responsibility of all Lewiston Ambulance employees. The responsibility includes ensuring compliance with Lewiston Ambulance's policies for confidentiality by non-Lewiston Ambulance employees

performing work at, or for Lewiston Ambulance. Non-Lewiston Ambulance employees, working with Lewiston Ambulance, must be informed of their obligations regarding Lewiston Ambulance confidentiality policies and agree to consequences appropriate to any breaches by them of Lewiston Ambulance confidentiality policy. Contracts should include references to the policy and consequences of breach. Nondisclosure and confidentiality agreement documents should be used to ensure Lewiston Ambulance security.

Human Resources has guidelines for the release of sensitive information. Sensitive information is defined as W-2 statements, statements of earnings, hand drawn checks, home addresses and phone numbers, work locations and phone numbers, and detailed benefit and salary information.

Procedure

Employees who have a reasonable basis to believe that a breach of confidentiality has occurred should report the incident as soon as possible to any of the following:

- Immediate supervisor
- Administrator
- Human Resources
- Information security officer
- Privacy officer

Employees who have a reasonable basis to believe that a breach of confidentiality has occurred but do not report it are subject to corrective action.

An investigation will be conducted by administration responsible for monitoring the performance of the employee suspected of breaching confidentiality. All information gathered from the investigation will be reviewed with the appropriate member(s) of management, the information security officer, the privacy officer, Human Resources, and Legal Counsel, if warranted. These individuals will document the investigation and determine what corrective action is to be taken, which may include, but is not limited to, suspension or termination of employment.

Under no circumstances will retaliation or intimidation of a complainant be tolerated.