

Great Rivers Behavioral Health Organization

Policy Title:	Credentialing Confidentiality	Policy No. 6017
Category:	Credentialing	Date Adopted: 03/08/2019
Reference:	HCA Contract with Great Rivers Behavioral Health WAC 246-341-0515 NCQA Accreditation guidelines State and Federal credentialing requirements	

Policy:

- 1.1. Credentialing and recredentialing information gathered by Great Rivers Behavioral Health Organization ("Great Rivers") is kept confidential and disclosure is limited to parties who are legally permitted to have access to the information under state and federal law.
- 1.2. Great Rivers does not share with or allow a practitioner to review references or recommendations, or other information that is peer-review protected.

Definition:

- 2.1. Representative" shall mean any individual authorized to perform specific information gathering or disseminating functions for the purpose of evaluating, improving, achieving or maintaining quality and cost effective patient care.

Procedure:

- 3.1. Information regarding any practitioner or provider submitted, collected, or prepared by any representative of this or any other health care facility or organization or medical staff for the purpose of evaluating, improving, achieving or maintaining quality and cost effective patient care shall, to the fullest extent permitted by law, be confidential and shall only be disseminated to a Representative in order to carry out appropriate activities under these Policies and Procedures. Confidentiality shall also extend to such information that is provided by third parties.
- 3.2. For purposes of this section "information" may be any written or oral disclosures including, but not limited to, a practitioner's or provider's professional qualifications, clinical ability, judgment, character, physical or mental health, emotional stability, professional ethics, or any other matter that might directly or indirectly affect patient care or practitioner's or provider's provision of patient care services.
- 3.3. By providing patient care services at Great Rivers, a practitioner or provider:
 - 3.3.1. Authorizes representatives of Great Rivers to solicit, provide, and act upon information bearing on the practitioner's or provider's qualifications.
 - 3.3.2. Agrees to be bound by the provisions of this policy and procedure and to waive all legal claims against any representative who acts in accordance with the provisions of this policy and procedure.
 - 3.3.3. Acknowledges that the provisions of this policy and procedure are express conditions of the application for, or acceptance of, Great Rivers membership and the continuation of such membership, and to the exercise of clinical privileges or provision of patient care.
- 3.4. The confidentiality and immunity provisions of this policy and procedure shall apply to all information so protected by State or Federal law. To the fullest extent permitted by State or

Federal law, the confidentiality and immunity provisions of this policy and procedure shall include, but is not limited to:

- 3.4.1. Any type of application or reapplication received by the Provider or Practitioner;
 - 3.4.2. Actions reducing, suspending, terminating or revoking a practitioner's and provider's status, including requests for corrective actions, investigation reports and documents and all other information related to such action;
 - 3.4.3. Hearing and appellate review;
 - 3.4.4. Peer review and utilization and quality management activities;
 - 3.4.5. Risk management activities and claims review;
 - 3.4.6. Potential or actual liability exposure issues;
 - 3.4.7. Incident and/or investigative reports;
 - 3.4.8. Claims review;
 - 3.4.9. Minutes of all meetings by any committees otherwise appropriately appointed by the Board;
 - 3.4.10. Any activities related to monitoring the quality, appropriateness or safety of health care services;
 - 3.4.11. Minutes of any Committees and Subcommittees related to monitoring the quality, appropriateness or safety of health care services;
 - 3.4.12. Any Great Rivers operations and actions relating to practitioner and provider conduct.
- 3.5. The Director in charge of Credentialing grants access to electronic credentials files only as necessary to complete credentialing work or as required by law. Access to these documents are restricted to authorized staff, Credentialing Committee members, peer reviewers and reporting bodies as authorized by the Credentialing Committee or the Governing Board of Great Rivers.
 - 3.6. Minutes, reports and files of Credentialing Committee meetings are stored in secure electronic folders or in locked cabinets in the Credentialing Department and will be protected from discovery under all applicable laws.
 - 3.7. Copies of minutes and any other related Credentialing Committee meeting materials will not be allowed to be removed from meetings of peer review committees and Credentialing staff will shred extra sets of information from such meetings.
 - 3.8. Electronic data and/or information are password protected.
 - 3.8.1. Each person is given a unique user ID and password.
 - 3.8.2. It is the strict policy of Great Rivers that employees keep their passwords confidential and never share their passwords with anyone.
 - 3.8.2.1. Great Rivers Staff is instructed not to divulge passwords to their co-workers.
 - 3.8.3. All Credentialing employees are prompted to change their passwords into the system every three-months.

POLICY SIGNATURE

Edna J. Fund, Chair
Great Rivers Governing Board

03/08/2019

Date