

SECTION: PATIENT CARE

NUMBER: 08-117

SUBJECT: DIRECTORY INFORMATION:  
DISCLOSURE OF A PATIENT'S INFORMATION

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**PURPOSE:** To establish guidelines for disclosures from the John Dempsey Hospital (JDH) Directory and Clergy Directory and to assure that patients are provided an opportunity to object and opt out of the directory as required by the HIPAA Privacy Rule.<sup>1</sup>

**SCOPE:** This policy applies ONLY to JDH patients being cared for in a bed on inpatient nursing units. Patients admitted to psychiatry and patients in the custody of the Department of Correction are not included in the hospital directory.

**POLICY:**

1. Notice of Privacy Practices and Opportunity to Object.
  - The JDH will inform patients through the Notice of Privacy Practices<sup>2</sup> about information that is available in the hospital directory and to whom the information may be released. Patients will also be notified as part of the admission process that directory information may be disclosed unless they opt to restrict it.
  - Hospital patients will have the opportunity to restrict the release of directory information. JDH can accept restrictions for either the entire hospital directory which includes the clergy directory or a patient may restrict disclosure to clergy only.
  - A patient who has opted out of the Directory is considered a "Confidential" patient and will not receive any mail or other deliveries. Callers and visitors will be told that there is no information on a patient who opts out of the JDH Directory.
  - In emergency situations or patient incapacity, the patient's expressed preference at last admission will be consulted. The decision whether or not to disclose information will be consistent with this prior preference if it is in the best interest of the patient. If there is no prior preference on record, professional judgment shall be exercised.
    - If the patient is incapacitated, a legally authorized representative may request opt-out on behalf of the patient.
    - When the patient's condition allows, JDH will provide the patient an opportunity to restrict disclosures for directory purposes.
2. Documentation of Opt-Out information.
  - Opt-out information will be documented on the JDH Directory Opt-out Form<sup>3</sup> which is included in the admission paperwork.
  - For any patient who chooses to opt-out of the directory, the completed form will be included in the medical record.
  - Opt outs will be recorded in IDX as a "Confidential" patient and will be valid for the current admission only.
  - It is the responsibility of staff admitting patients to enter opt-out information in IDX.

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3. Information in the hospital directory is limited to:
  - Patient name
  - Patient location (floor, room number, and phone number of the patient's room)
  - Patient's condition in general terms (treated and released, undetermined, fair, stable, serious, critical)
  - Religious affiliation
  
4. Disclosure of directory information is limited to the following:
  - Patient location and condition may be released to a person who asks for the patient by name
  - Patient name, location, condition and religious affiliation may be given to a member of the clergy.
  
5. Inquiries regarding the hospital patient directory:
  - For all non-media related inquires, JDH telephone operators and the Information Desk volunteers may release directory information.
  - Inquiries regarding patient condition should be directed to the nursing unit.
  - Media releases will not include patient location and will be managed as described in JDH Media Relations policy.<sup>4</sup>
  
6. Disclosures for which opt-out does not apply:
  - JDH may release directory information to anyone authorized by law to assist in disaster relief efforts. (e.g. other hospitals, health care facilities, relief agencies, law enforcement agencies).
  - JDH may also disclose directory information to notify or assist in the notification of a family member, a personal representative or another person responsible for the patient's care of the patient's location, general condition or death.

UCONN HEALTH  
JOHN DEMPSEY HOSPITAL  
ADMINISTRATIVE MANUAL

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\_\_\_\_\_  
Anne Diamond, JD, CNMT  
Chief Executive Officer  
John Dempsey Hospital

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Date

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Iris Mauriello  
Compliance Integrity/Privacy Officer

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Date

ATTACHMENTS: JDH Directory Opt-out Form, [HCH 2590](#)

NEW POLICY: Replaces UConn Health Policy 2003-26 Directory Information: Disclosure of a Patient's Information (Privacy and Security of Protected Health Information (PHI))

Date issued: 4/12/16

Date revised:

Date reviewed:

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<sup>1</sup> Health Insurance Portability and Accountability Act of 1996, 45 CFR 164.510(a), [http://edocket.access.gpo.gov/cfr\\_2002/octqtr/pdf/45cfr164.510.pdf](http://edocket.access.gpo.gov/cfr_2002/octqtr/pdf/45cfr164.510.pdf)

<sup>2</sup> [UConn Health, Notice of Privacy Practices](#)

<sup>3</sup> JDH Directory Opt-out Form, [HCH 2590](#)

<sup>4</sup> [John Dempsey Hospital Administrative Manual, Policy #03-005 Media Relations](#)