2021-05 Uses and Disclosures of Directory Information under HIPAA

<table>
<thead>
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<th>Title</th>
<th>Uses and Disclosures of Directory Information under HIPAA</th>
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<tr>
<td>Policy Owner and Contact Information</td>
<td>Office of Healthcare Compliance and Privacy <a href="mailto:privacyoffice@uchc.edu">privacyoffice@uchc.edu</a></td>
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<td>Campus Applicability</td>
<td>UConn Health</td>
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<td>Applies to</td>
<td>UConn Health Workforce</td>
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<td>Effective Date</td>
<td>February 9, 2022</td>
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PURPOSE:
To comply with certain provisions of the Health Insurance Portability and Accountability Act of 1996 and the Health Information Technology for Economic and Clinical Health Act and the associated regulations (collectively, “HIPAA”) concerning uses and disclosures of Directory Information (as defined below).

POLICY STATEMENT:
UConn Health maintains a Hospital directory and may use and disclose Directory Information as set forth in this policy and the UConn Health Notice of Privacy Practices.

The Hospital directory includes inpatients, patients on observation status, and patients in the Emergency Department at John Dempsey Hospital. Patients on psychiatric units and patients in the custody of the Department of Correction are excluded from the Hospital directory, and this policy does not apply to them. In addition, UConn Health may exclude any other patient from the Hospital directory at its discretion, and this policy does not apply to any patient so excluded. UConn Health provides patients the opportunity to agree or object to the use and disclosure of Directory Information.

Unless a patient (or authorized representative) objects, UConn Health may disclose a patient’s Directory Information to:

- Individuals who ask for the patient by name;
- A member of the clergy, whether or not the clergy member asks for the patient by name;
- The media, but only in accordance with Policy 2021-04 Disclosures of Protected Health Information to the Media.

Disclosures of Directory Information must be consistent with UConn Health’s Notice of Privacy Practices.
DEFINITIONS:
Privacy Definitions
Directory Information: Directory Information consists of patient name and patient location within John Dempsey Hospital. With respect to the use or disclosure of PHI by or to clergy members, Directory Information also includes a patient’s religious affiliation.

PROCEDURES/FORMS:
Procedures for 2021-05 Directory Information

REFERENCES:
45 C.F.R. § 164.510(a) (HIPAA Privacy Rule)

RELATED POLICIES:
UConn Health Notice of Privacy Practices
2021-04 Disclosures of Protected Health Information to the Media
2003-25 Uses and Disclosures of PHI Involving Family, Friends, and Others
2012-05 Legal Representative for Health Care Decisions

ENFORCEMENT:
Violations of this policy or associated procedures may result in appropriate disciplinary measures in accordance with University By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, the University of Connecticut Student Code, other applicable University Policies, or as outlined in any procedures document related to this policy.

APPROVAL:

Bruce Liang (Signed) 2/9/2022
Bruce Liang Date
UConn Health Chief Executive Officer

Kiki Nissen (Signed) 2/9/2022
Kiki Nissen Date
Administrative Policy Committee Vice-Chair

Janel Simpson (Signed) 2/9/2022
Janel Simpson Date
Administrative Policy Committee Chair

POLICY HISTORY:
New Policy Approved: 4/12/16 (Replaced prior UConn Health Policy 2003-26 Directory Information: Disclosure of a Patient's Information (Privacy and Security of Protected Health Information (PHI))
Reviewed Without Changes:
Revised: 11/18, 2/22