

UConn HEALTH

Administrative Policy

2021-05 Uses and Disclosures of Directory Information under HIPAA

Title	Uses and Disclosures of Directory Information under HIPAA
Policy Owner and Contact Information	Office of Healthcare Compliance and Privacy privacyoffice@uchc.edu
Campus Applicability	UConn Health
Applies to	UConn Health Workforce
Effective Date	February 9, 2022

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)
Bruce Liang
UConn Health Chief Executive Officer

2/9/2022
Date

Kiki Nissen (Signed)
Kiki Nissen
Administrative Policy Committee Vice-Chair

2/9/2022
Date

Janel Simpson (Signed)
Janel Simpson
Administrative Policy Committee Chair

2/9/2022
Date

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