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| Type of Document:            | Policy                          |
| Type of Policy:              | Department                      |
| Applicability:               | All                             |
| Owner's Dept:                | Credentialing and Enrollment    |
| Title of Owner:              | Director                        |
| Title of Approving Official: | UVMHN C&E Medical Director      |
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**SUBJECT:** Practitioner Confidentiality

**PURPOSE:** The University of Vermont Health Network Credentialing & Enrollment (“UVMHN C&E”) Department ensures confidentiality of all practitioner information obtained in the credentialing process.

**POLICY STATEMENT:** All provider information, including, but not limited to, credentialing, performance evaluation, quality assurance, quality improvement, compliance auditing and peer review documentation, is kept confidential.

**PROCEDURE :**

1. The UVMHN C&E Department considers practitioner-specific data and information, including but not limited to, that used for credentialing, performance evaluation, quality assurance, quality improvement, compliance auditing and peer review confidential to the extent permitted by law.
  - 1.1. A practitioner’s name, professional degree, employment status, business address, business telephone number, and specialty(ies) or self-identified areas of special interest are not considered confidential when disclosed for legitimate business purposes.
  - 1.2. Data and information related to a practitioner’s racial, cultural or ethnic background, age, religious affiliation, and sexual orientation, and ability to communicate in languages other than English, are confidential unless a practitioner explicitly authorizes to the release of this information. Each practitioner signs an Authorization and Attestation that permits release of credentialing data to contracted third party payors.
2. Physical practitioner files are maintained in a locked room or locked file cabinet when not being used by the UVMHN C&E Department staff or the Credentials Committee. Practitioner files stored in electronic format are protected with a secure password.
3. Access to practitioner files is limited to the UVMHN C&E Department staff and the Credentials Committee.
4. UVMHN C&E Department staff keep practitioner files in locked areas when not using the file for credentialing or recredentialing activities.
5. Computer screens with practitioner information are not visible to persons other than the UVMHN C&E Department staff using the computer.
6. UVMHN C&E Department staff computers are protected with individual unique user ID & password. Passwords are not shared.
7. Practitioners may review the information in his or her file upon request except for any information from the National Practitioner Data Bank (NPDB) and peer (Physician Advisor) review information. Review of NPDB information is prohibited by Federal statute.
  - 7.1. Each practitioner is informed of the right to review information in his or her file through the application packages for initial credentialing and recredentialing.

- 7.2. A Practitioner may obtain a copy of his or her file.
  - 7.2.1. The request must be in writing.
  - 7.2.2. UVMHN C&E Department staff will send a copy of a practitioner's file to them within ten (10) business days of receipt of the written request for the file. This file, when mailed, will be sealed in an envelope marked confidential or sent by encrypted email.
    - 7.2.2.1. NPDB information is not included.
    - 7.2.2.2. Peer review information is not included.
8. UVMHN C&E Department staff shred all printed confidential information not, or no longer, required for the practitioner's credentialing or recredentialing file.

**MONITORING PLAN:** Policy will be monitored in accordance with Policy C&E 6 Ongoing Monitoring.

**DEFINITIONS:**

**Credentials Committee** means a committee appointed by the UVMHN C&E Board of Directors and chaired by the UVMHN C&E Medical Director to credential and recredential practitioners.

**Medical Director** means the UVMHN C&E Medical Director appointed by the UVMHN C&E Board of Directors to be the chairperson to the UVMHN C&E Credentials Committee and to be responsible for the decisions of the Credentials Committee.

**Physician Advisor** means a qualified physician in a same or similar specialty that provides peer review services at the request of the UVMHN C&E Board of Directors.

**Practitioner** means the UVMHN Health Care Partners billing practitioners, including but not limited to, physicians, oral surgeons, podiatrists, ambulatory pharmacist clinicians, nurse practitioners, physician assistants, psychologists, social workers, other masters' level clinicians, and all other health care practitioners.

**The University of Vermont Health Network's Health Care Partners** ("UVMHN Health Care Partners") means The University of Vermont Medical Center, Central Vermont Medical Center, Porter Medical Center, Champlain Valley Physicians Hospital, Elizabethtown Community Hospital, Alice Hyde Medical Center and any other entity to join UVMHN as a Health Care Partner.

**RELATED POLICIES:**

C&E 1 Credentials Plan  
C&E 10 Credentialing & Recredentialing Processes

**REFERENCES:** National Committee for Quality Assurance  
Vermont Rule H-2009-03

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Credentialing and Enrollment Department  
Policy C&E 8: Practitioner Confidentiality

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