

## CONFIDENTIAL COMMUNICATION

- a) **POLICY—Confidential Communication.** We will allow an individual to request confidential communications (that is, the use of alternative means or alternative locations when we communicate protected health information to the individual), if the request is reasonable and in writing.

**PROCEDURE—Confidential Communication Response.** Only our Privacy Officer may approve a request for confidential communication of protected health information. Our Privacy Officer will process each confidential communication request as follows:

- Track the processing of the confidential communication request on the appropriate form.
- Respond to the individual by means and location appropriate to the confidential communication request. Our Privacy Officer will inform the individual whether we will accommodate the confidential communication request or whether the request cannot be accommodated without additional information.
- If the individual's request contains (a) a reasonable alternative address or means of contact and (b) an explanation how any applicable payment related to the activities underlying the protected health information subject to the request will be handled, use the appropriate form to inform the individual that the request will be accommodated. The response must use the means or location appropriate to the confidential communication request.
- If we accommodate the confidential communication request, use the appropriate form to notify affected departments and business associates of their obligation to comply with the confidential communication request.
- If the individual's request does not contain the requisite information listed above, use the Denial of Confidential Communication Request to inform the individual that we will not accommodate the confidential communication request without additional, specified information. The response must use the means or location appropriate to the confidential communication request.
- Have the completed form included in the individual's records, and retain a copy for the Privacy Officer file.

**PROCEDURE—Departments.** The managers of each affected department must ensure that the workforce members are informed of a confidential communication obligation, and that the department communicates the protected health information subject to the confidential communication obligation to the individual only by the alternative means or at the alternative location specified in the Notification Confidential Communication Requirement from our Privacy Officer. Personnel of each department must consult the department Director, our Privacy Officer before making a

communication of protected health information, if there is any question whether that communication should be treated as a confidential communication.

- b) **POLICY—Minors.** State law that requires disclosure of minor’s protected health information to a parent, guardian or person acting in loco parentis takes priority over a minor’s request for confidential communication.

**PROCEDURE—Minors.** If you have any question whether communication of a minor’s protected health information should be treated as a confidential communication, consult your department manager or our Privacy Officer before you make the communication.

- c) **POLICY—Documentation.** We will retain, on paper or electronically, each request for confidential communication, our response, and all other documentation relating to our compliance with our obligations with respect to confidential communication requests until 6 years after the later of their receipt or last effective date.

**PROCEDURE—Documentation.** You must include in the individual’s records and furnish our Privacy Officer each request for confidential communication, our response, and any other documentation relating to our compliance with our obligations with respect to confidential communication requests. Our Privacy Officer will retain this documentation until 6 years after the later of its receipt or last effective date.