**Systemwide Policy: HIPAA - Confidentiality & Security Agreement - SCL Health**

**Department(s) Initiating:** Integrity & Compliance

**Application:** This policy applies to SCL Health and all its Controlled Corporations, as that term is defined in the SCL Health Bylaws, and to any entity owned in part by SCL Health or an affiliate and/or managed by SCL Health or an affiliate, if that entity’s governing body has adopted the policy [as its own].

**Document Owner:** Madonna Moranville (Sys Privacy-Security Officer)

**Effective Date:** 11/14/2017  
**Next Review Date:** 11/14/2020

**Committee/Executive Approver(s):** Lydia Jumonville  
(System President and CEO)  
**Approval Date:** 11/14/2017

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**Purpose:**
To establish a standard Confidentiality and Security Agreement (CSA) to be signed by all Workforce Members of SCL Health and affiliated entities (Care Sites), and for Medical Staff members of an SCL Health hospital or contracted providers at clinics under the SCL Health Medical Groups/Provider Services division (MGPS).

**Scope:**
This policy applies to all persons working for or on behalf of SCL Health.

**Definitions:**
- **Care Site(s)** — location(s) where SCL Health provides care, such as hospitals, safety-net clinics, practices, home health, the children’s mental health treatment center and any virtual health activities.

- **Confidential Information** — for purposes of this policy, shall mean any SCL Health information that is sensitive and not publicly known, including, but not limited to, patient treatment and billing information, financial and other business or strategic information, and personnel and health plan information. Confidential Information also includes any information of a confidential nature received by SCL Health from a third party under a non-disclosure agreement, or any proprietary information prepared or created by all persons working for or on behalf of SCL Health during the course of his/her employment or engagement.

- **Workforce or Workforce Member** — shall include, but not be limited to, SCL Health or Care Site associates (including employed providers), volunteers, trainees, students, locum tenens, agency staff, individual contracted staff, and other persons whose conduct, in the performance of work for SCL Health or a Care Site, is under the direct control of SCL Health or a Care Site, whether or not they are paid by such entity. Business Associates, with whom SCL Health has a Business Associate Agreement, are excluded from this definition.

**Policy:**
1. The SCL Health Confidentiality and Security Agreement establishes specific responsibilities Workforce Members have in relation to information security and the protection of sensitive information, including Confidential Information, from unauthorized disclosure. These Workforce Member obligations support federal regulations governing confidentiality and security, including the HIPAA Privacy and Security Rules.

2. All SCL Health Workforce Members who are granted access to SCL Health Confidential Information, or granted access to SCL Health systems shall acknowledge by signing the [HIPAA - Confidentiality & Security Agreement - SCL Health - Supporting Document](#), wherein they agree to...
abide by the SCL Health HIPAA Privacy and Information Security policies. Workforce Members will be asked to agree to the terms at least every three years or when significant revisions to the agreement are made.

3. All members of the Medical Staff of an SCL Health hospital or contracted providers at MGPS clinics shall acknowledge by signing the [HIPAA - Confidentiality & Security Agreement - Medical Staff - SCL Health - Supporting Document](#), wherein they agree to abide by the SCL Health HIPAA Privacy and Information Security policies. Medical Staff members will be asked to agree to the terms at initial credentialing and re-credentialing, and MGPS contracted providers, at least every three years or when significant revisions to his or her agreement are made.

4. The [HIPAA - Confidentiality & Security Agreement - SCL Health - Supporting Document](#) for Workforce Members and the [HIPAA - Confidentiality & Security Agreement - Medical Staff - SCL Health - Supporting Document](#) shall supersede similar previous agreements at the System, Care Site or MGPS level.

### Procedure: Obtain Confidentiality and Security Agreements from Workforce Members - SCL Health

<table>
<thead>
<tr>
<th>#</th>
<th>Required Action Step (step by step process)</th>
<th>Performed By</th>
<th>Supplemental Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Distribute CSA to all Workforce Members.</td>
<td>System Privacy/Security Officer, Human Resources, and Supervisors, Managers and others in Workforce Members’ chain of command</td>
<td>Distribution will be accomplished through HealthStream, the learning management system, for existing Workforce Members and Taleo, the human resources applicant tracking system, for new Workforce Members. For other Workforce members, a supervisor or above shall provide a copy of the individual’s signed CSA when access is requested. Refer to <a href="#">HIPAA - Confidentiality &amp; Security Agreement - SCL Health - Supporting Document</a>.</td>
</tr>
<tr>
<td>2</td>
<td>Review and agree to abide by the terms of the Confidentiality and Security Agreement.</td>
<td>All Workforce Members</td>
<td>Agreement may be completed either through Taleo for new hires, or in HealthStream, or in hard copy.</td>
</tr>
<tr>
<td>3</td>
<td>Ensure that all Workforce Members complete Step 2.</td>
<td>Supervisors, Managers and others in Workforce Members’ chain of command; Human Resources</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Ensure that each Workforce Member’s completion is properly</td>
<td>Human Resources</td>
<td></td>
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### Systemwide Policy: HIPAA - Confidentiality & Security Agreement - SCL Health

**Document Owner:** Madonna Moranville (Sys Privacy-Security Officer)

- **Policy Reference #:** 674
- **Policy Version #:** 2
- **Page #:** 3
- **Recorded in:**

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**References:**
- None

**Other Related Policies:**
- HIPAA Privacy Policies
- Information Security Policies

**Supporting Documents:**
- [HIPAA - Confidentiality & Security Agreement - SCL Health - Supporting Document](#)
- [HIPAA - Confidentiality & Security Agreement - Medical Staff - SCL Health - Supporting Document](#)

**Monitoring:**
At least once a year, the System Privacy/Security Officer will do a random audit of HealthStream and Taleo, as applicable, to confirm Workforce Members have agreed to the terms of this agreement. As part of the credentialing and re-credentialing process, Care Site Medical Staff Office associates will confirm Medical Staff members have agreed to the terms of this agreement. At least once a year, the MGPS Compliance/Privacy Officer will confirm that contracted providers have agreed to the terms of this agreement.

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**Procedure: Obtain Confidentiality and Security Agreements from Medical Staff Members or Contracted MGPS Providers - SCL Health**

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<tr>
<td>1</td>
<td>Distribute CSA to all Medical Staff Members or contracted MGPS providers.</td>
<td>Hospital Medical Staff Office; MGPS Clinic Administrators</td>
<td>Signed agreements will be obtained from members of the Medical Staff as part of the credentialing and re-credentialing process. Signed agreements will be obtained from contracted MGPS providers during their onboarding process. Refer to <a href="#">HIPAA - Confidentiality &amp; Security Agreement - Medical Staff - SCL Health - Supporting Document</a>.</td>
</tr>
<tr>
<td>2</td>
<td>Review and agree to abide by the terms of the Confidentiality and Security Agreement - Medical Staff/Contracted Providers.</td>
<td>All Medical Staff Members and Contracted Providers</td>
<td>Agreement shall be completed as part of the credentialing/re-credentialing process or onboarding process for MGPS contracted providers.</td>
</tr>
<tr>
<td>3</td>
<td>Ensure that all Medical Staff Members and contracted providers complete Step 2.</td>
<td>Hospital Medical Staff Office; MGPS Clinic Administrators</td>
<td>Record in proper Medical Staff Office or MGPS records.</td>
</tr>
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