

Great Rivers Behavioral Health Administrative Services Organization

Policy Title:	Credentialing Confidentiality	Policy No. 4104.02
Category:	Credentialing	Date Adopted: 10/09/2020 Date Revised: Date Reviewed: 06/24/2021 10/19/2023
Reference:	HCA Contract with Great Rivers Behavioral Health Administrative Services Organization WAC 246-341-0515 National Committee for Quality Assurance Accreditation guidelines State and Federal credentialing requirements	

Policy:

- 1.1. Credentialing and recredentialing information gathered by Great Rivers Behavioral Health Administrative Services Organization (Great Rivers BH-ASO) is kept confidential and disclosure is limited to parties who are legally permitted to have access to the information under state and federal law.
- 1.2. Great Rivers BH-ASO does not share with or allow a behavioral health agency (BHA) or practitioner to review references or recommendations, or other information that is peer-review protected.

Definition:

- 2.1. **Representative** shall mean any individual authorized to perform specific information gathering or disseminating functions for the purpose of evaluating, improving, achieving, or maintaining quality and cost-effective patient care.
- 2.2. **Information** may be any written or oral disclosures including, but not limited to, a BHA or practitioner's professional qualifications, clinical ability, judgment, character, physical or mental health, emotional stability, professional ethics, or any other matter that might directly or indirectly affect patient care or the BHA or practitioner's provision of patient care services.

Procedure:

- 3.1. Information regarding any BHA or practitioner submitted, collected, or prepared by any representative of this or any other health care facility, organization, or medical staff for the purpose of evaluating, improving, achieving, or maintaining quality and cost effective patient care shall, to the fullest extent permitted by law, be confidential and shall only be disseminated to a Representative in order to carry out appropriate activities under these policies and procedures. Confidentiality shall also extend to such information that is provided by third parties.
- 3.2. By providing patient care services at Great Rivers BH-ASO, a BHA or practitioner:
 - 3.2.1. Authorizes representatives of Great Rivers BH-ASO to solicit, provide, and act upon information bearing on the BHA or practitioner's qualifications.
 - 3.2.2. Agrees to be bound by the provisions of this policy and procedure and to waive all legal claims against any representative who acts in accordance with the provisions of this policy and procedure.

- 3.2.3. Acknowledges that the provisions of this policy and procedure are express conditions of the application for, or acceptance of, Great Rivers BH-ASO membership and the continuation of such membership, and to the exercise of clinical privileges or provision of patient care.
- 3.3. The confidentiality and immunity provisions of this policy and procedure shall apply to all information so protected by State or Federal law. To the fullest extent permitted by State or Federal law, the confidentiality and immunity provisions of this policy and procedure shall include, but is not limited to:
 - 3.3.1. Any type of application or reapplication received by the BHA or provider;
 - 3.3.2. Actions reducing, suspending, terminating, or revoking a BHA or practitioner's status, including requests for corrective actions, investigation reports and documents, and all other information related to such action;
 - 3.3.3. Hearing and appellate review;
 - 3.3.4. Peer review and utilization and quality management activities;
 - 3.3.5. Risk management activities and claims review;
 - 3.3.6. Potential or actual liability exposure issues;
 - 3.3.7. Incident and/or investigative reports;
 - 3.3.8. Claims review;
 - 3.3.9. Minutes of all meetings by any committees otherwise appropriately appointed by the Governing Board;
 - 3.3.10. Any activities related to monitoring the quality, appropriateness, or safety of health care services;
 - 3.3.11. Minutes of any Committees and Subcommittees related to monitoring the quality, appropriateness, or safety of health care services;
 - 3.3.12. Any Great Rivers BH-ASO operations and actions relating to BHA and practitioner conduct.
- 3.4. The Credentialing Lead grants access to electronic credentialing files only as necessary to complete credentialing work or as required by law. Access to these documents are restricted to authorized staff, Credentialing Committee members, peer reviewers, and reporting bodies as authorized by the Credentialing Committee or Great Rivers BH-ASO Governing Board.
- 3.5. Minutes, reports, and files of Credentialing Committee meetings are stored in secure electronic folders or in locked cabinets and will be protected from discovery under all applicable laws.
- 3.6. Copies of minutes and any other related Credentialing Committee meeting materials will not be allowed to be removed from meetings of peer review committees and Credentialing staff will shred extra sets of information from such meetings.
- 3.7. Electronic data and/or information are password protected.
 - 3.7.1. Each person is given a unique user ID and password.
 - 3.7.2. It is the strict policy of Great Rivers BH-ASO that employees keep their passwords confidential and never share their passwords with anyone.
 - 3.7.2.1. Great Rivers BH-ASO Staff is instructed not to divulge passwords to their co-workers.
 - 3.7.3. All Credentialing employees are prompted to change their passwords into the system every three-months.

POLICY SIGNATURE

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Trinidad I. Medina
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10/20/2023

Trinidad Medina,
Chief Executive Director

Date