

DEPARTMENT: Administration
NAME: Confidentiality
POLICY NUMBER: BOT 1.3.2c
ORIGINATOR: MSOM, Inc. Board of Directors
ORIGINATION: 1/20/23

POLICY & PROCEDURE STATEMENT:

The confidentiality policy applies to all documents and proprietary information of Meritus School of Osteopathic Medicine. Confidential information (either hard copy, electronic, or verbal) associated with medical records, human resources, performance improvement, quality/risk management, research, financial, or organizational of any kind is strictly confidential and any request for release of such information should be directed to the source department for proper release.

Employees cannot use confidential employee or business information for personal reasons. For example, employees cannot use someone's address to seek political contributions. A federal law, Family Educational Rights and Privacy Act (FERPA), classifies most student record information as private. This information cannot be released to third parties (including parents) without signed consent from the student. All faculty and staff of the COM will complete training regarding FERPA laws at the time of employment and every two years thereafter.

Personal health information created or used by employee-sponsored health plans has special protection under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Upon request, an employee or his/her designated representative will have timely access to all information found in the employee's own personnel and medical files. Employees are to follow all applicable federal, state and local law as well as any additional policies and procedures specific to their position. Students will have access to all information within their individual student file.

For the purposes of this policy, confidential information includes, but is not limited to, information that identifies or describes an individual and the disclosure of which would constitute an unwarranted invasion of personal privacy. Examples of confidential employee and business information include home address and telephone number; medical information; birth date; citizenship; social security number; spouse/partner/ relative's names; income tax withholding data; performance evaluations; proprietary/ trade secret information; and academic peer review information.