

	Title: Confidentiality	Version: 2
	Owner: Melissa Mitchell (Director of Production)	Approved: 03/22/2018

Purpose: To establish guidelines regarding the confidentiality of enrollee information in accordance with federal regulation 42 CFR 431 Subpart F.

Responsibility: Quality Improvement (QI)/Utilization Review (UR) Committee

Scope: Advantage Dental Services, LLC

Definitions: n/a

Forms: n/a

References: 42 CFR 431 Subpart F; 42 CFR 438.100; 45 CFR Part 164; OAR 410-141-3180; OAR 410-141-3230

Policy:

1. The Dental Care Organization (DCO), its employees, representatives, and providers shall maintain the confidentiality of enrollee information and dental record information and release such information in accordance with federal regulation 42 CFR 431 Subpart F.
2. The DCO's employees, representatives, and providers shall not discuss information about an enrollee's condition, health status, personal affairs, claims history, or any other information (except those responsible for enrollee's care and treatment) without full consent of the enrollee, unless compelled to do so by law.
3. Access to the enrollee's dental records is reserved to only those persons involved with the enrollee's direct dental care. Examples: the PCD, the referral specialist, the DCO's Case Management, Coordinated Care Organization (CCO), Medical Assistance Program (MAP) and its representatives, etc.
4. Any request by an enrollee to see his or her dental records shall be referred to the provider for review and approval of all records to be released to the enrollee within 14 days.
5. Managed Care Organizations (MCOs), including CCOs, may share information with another MCO if it is directly connected with the administration of the Oregon Health Plan (OHP) program. MAP has determined that sharing information regarding capitated services that have limitations, such as dentures, is directly connected to the administration of the program and should be shared.
6. Monitoring and enforcement: Any breach of confidentiality by the DCO's employees and/or representatives is considered a major offense and will require immediate disciplinary action, which may include suspension from work or immediate termination.

Confidentiality issues involving providers and/or provider staff will be managed by the QI Committee, Compliance Department and Privacy Officer and could result in the provider's removal from the provider network.

Approvals:

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Approved by:
 Lorena Reinhart (Executive Assistant), Executive Assistant, Operations

Reviewed and Revised

06/14/2012	Jeanne Dysert	Tamara Kessler	Missy Mitchell	
05/02/2014	Jeanne Dysert	Tamara Kessler	Missy Mitchell	Laura Donadio
02/23/2015	Jeanne Dysert	Tamara Kessler	Missy Mitchell	Laura Donadio
02/23/2016	Jeanne Dysert	Tamara Kessler	Missy Mitchell	Jeff Dover
02/14/2017	Jeanne Dysert	Tamara Kessler	Missy Mitchell	
03/17/2017	QI/UR Committee			
03/12/2018	Jeanne Dysert	Tamara Kessler	Missy Mitchell	Rose Novak