

SUBJECT: Privacy Protection Policy in Regard to the Confidentiality of Social Security Numbers, Personal Information, and Identity Theft Prevention**BACKGROUND**

OrthoConnecticut collects and uses Social Security numbers and other personal information of patients for purposes of assuring the proper identification of patients for treatment, payment, and patient-related health care operations, and of employees and staff for purposes of personnel and practice-related health care operations.

Any employee or staff member who improperly uses Social Security numbers or other personal information is subject to corrective action, which could include discharge. Improper use of Social Security numbers or other personal information also may result in civil penalties or criminal prosecution under state law.

DEFINITIONS

“Personal information” means information capable of being associated with a particular individual through one or more identifiers, including, but not limited to, a Social Security number, a driver’s license number, a state identification card number, an account number, a credit or debit card number, a passport number, an alien registration number, or a health insurance identification number. It does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records or widely distributed media.

POLICY

It is the policy of the OrthoConnecticut to protect the privacy of personal information including Social Security numbers. Use and disclosure of personal information shall be in accordance with the provisions of applicable law.

It is the further policy of OrthoConnecticut to: (1) Protect the confidentiality of Social Security numbers; (2) prohibit the unlawful disclosure of Social Security numbers; and (3) limit access to Social Security numbers to employees and staff engaged in activities related to treatment, payment, or health care operations.

In addition to this policy, OrthoConnecticut shall use and access patient-related Social Security numbers and personal information in accordance with all applicable requirements of state and federal law, including the Health Insurance Portability and Accountability Act and its corresponding regulations. As appropriate, OrthoConnecticut will endeavor to establish an identity-theft prevention program. This policy is not in any manner intended to alter, limit, or qualify other practice policies addressing confidentiality and protected health information.

EFFECTIVE DATE: 12/1/2017