

Status **Active** PolicyStat ID **17372964**



Origination 08/1999  
Last Approved 10/2025  
Effective 10/2025  
Last Revised 10/2025  
Next Review 10/2026

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Applicability Aspirus System  
Wide  
References Template:  
Policy

## Confidentiality Policy

### SCOPE:

- Aspirus System Wide

### STAKEHOLDERS:

- Directors, officers, employees, volunteers, and the medical staff of Aspirus, Inc. and its subsidiaries and affiliated entities (collectively "Aspirus").

### PURPOSE:

To define the legal requirements of confidentiality for Aspirus, Inc.

### ABBREVIATIONS:

- BPI: Business Proprietary Information
- EI: Employee Information
- PHI: Protected Health Information

### DEFINITION:

- Business Proprietary Information (BPI): Business information of a nature related to the operations, finances, marketing or strategic plans, or internal performance measurement . Proprietary information obtained through verbal or written internal communication is confidential unless it is made public through Administration or Marketing Services. Such

information may include but is not limited to trade secrets, marketing or promotional plans, staff recruiting or retention strategies, quality or satisfaction ratings, patient/customer complaints or feedback, or terms of contracts. is defined as any information or material that is confidential to the company, which the employee may obtain through any direct or indirect contact with the company.

- Employment Information (EI): Includes but may not be limited to employee address, birth date, telephone number, credentials, personnel file, job application, performance appraisal, discipline, termination, investigations, compensation and benefits.
- Protected Health Information (PHI): Individually identifiable health information that is transmitted electronically, maintained electronically or transmitted or maintained in any other form or medium. This broad definition includes electronic, magnetic, optical and paper records, as well as oral statements.

## **POLICY:**

### **1. General Provisions**

- A. All protected information included in this policy will remain confidential and will not be released without authorization, except in specific circumstances designated by law.
- B. All Aspirus Employees and Medical Staff members and others affiliated with Aspirus, Inc., such as volunteers and students, have a duty of confidentiality. All Aspirus employees and volunteers will complete the "Agreement of Confidentiality" as a condition of employment or service.

### **2. Business Proprietary Information (BPI):**

- A. Aspirus BPI shall only be accessed or used for purposes that support your job function.
- B. Aspirus BPI is prohibited from being used for non-work related activities without approval from Leadership or the Chief Compliance Officer.
  - Example: Disclosing an Aspirus developed process on a personal website.
  - Example: Using Aspirus financial data for a school project.
- C. Aspirus BPI should only be released to Third Parties for legitimate business purposes and must be authorized by the Operational Leaders.
  - Example: Device Representative requesting information about surgeries performed.

### **3. Employee Information (EI):**

- A. Access to personal employment records must go through Human Resources (Release of Employee Information Policy - System).
- B. Access to employee health records (ie. pre-employment screenings, exposure, etc.) results may be requested through Employee Health and Wellness.
- C. Aspirus employees may not share personal information regarding other Aspirus employees without authorization (i.e. employee's personal phone numbers, home address, work

schedules, etc.).

## **4. Protected Health Information (PHI):**

- A. All users are responsible for following all Aspirus policies related to HIPAA.
- B. Only individuals authorized by the patient or the patient's legal representative are permitted to obtain patient's health information. Relatives, or other individuals assisting in a patient's care, may receive patient health information to the extent necessary for them to care for the patient's needs.
- C. A patient's medical history, condition, prognosis, or any aspect of a patient's protected health information must not be accessed for personal use without proper authorization or the subject of casual conversation or correspondence within or outside all Aspirus facilities.
- D. Users are not authorized to access their own electronic medical record.
- E. Users are not authorized to access medical records of immediate family or household members. For definition of immediate family or household member and any exceptions, refer to Provider And Non-Provider Employee Self-Treatment And/Or Treatment Of Immediate Family Or Household Members Policy.
- F. Users are prohibited from asking a colleague to access information on behalf of the employee if the purpose does not support a treatment, payment or healthcare operation. Employees should contact the Health Information Management department or sign up for the online patient portal at their entity for access to their medical records.
- G. For more information on handling PHI, please refer to relevant HIPAA policies.

**5. Person willfully violating confidentiality requirements are subject to disciplinary action as indicated by applicable Aspirus policies, Code of Conduct, medical staff bylaws, and Federal and State rules and regulations.**

**6. The Confidentiality Agreement is required to be reviewed and signed within 30 days of start date and annually.**

## **REFERENCE:**

1. Health Insurance Portability and Accountability Act of 1996 ("HIP") Pub. L.104-191.

## **SUPPORTING DOCUMENTS:**

- None

## ADDENDUM:

- None

## COMMITTEE APPROVALS:

- None

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## Attachments

[AGREEMENT OF CONFIDENTIALITY - Affiliates 2025.pdf](#)

[AGREEMENT OF CONFIDENTIALITY 2025.pdf](#)

## Approval Signatures

Step Description	Approver	Date
Approver	Katherine Becker: CHIEF COMPLIANCE OFFICER	10/2025
Policy Owner	Angela Anderson: COMPLIANCE SPECIALIST	10/2025

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## Applicability

Aspirus Chippewa Falls Hospital, Aspirus Divine Savior Hospital, Aspirus Eagle River Hospital, Aspirus Iron River Hospital, Aspirus Ironwood Hospital, Aspirus Keweenaw Hospital, Aspirus Lake View Hospital, Aspirus Langlade Hospital, Aspirus Medford Hospital, Aspirus Medical Group Inc., Aspirus Merrill Hospital, Aspirus Post Acute Care/MedEvac, Aspirus Rhinelander Hospital, Aspirus St. Luke's Hospital, Aspirus Stanley Hospital, Aspirus Stevens Point Hospital, Aspirus Tomahawk Hospital, Aspirus Wausau Hospital, Aspirus Wisconsin Rapids Hospital, Aspirus, Inc., Howard Young Medical Center