

Greater New Orleans Health Information Exchange (GNOHIE)

SENSITIVE DATA POLICY

Approval Date: 7-24-2012

Effective Date: 8-1-2012

Scheduled Review Date: 5-20-2014

Goal: The *Sensitive Data* policy aims to ensure that the Greater New Orleans Health Information Exchange (GNOHIE) and GNOHIE Participating Organizations and Members appropriately exclude Sensitive Data from being shared through the GNOHIE in a manner consistent with sound policy and in accordance with applicable law.

Scope: This policy applies to GNOHIE and data stored within GNOHIE.

Purpose: This policy describes the responsibility of GNOHIE and Participating Organizations and Members in excluding Sensitive Data from being shared in the GNOHIE. The provision of specific protocols and procedures governing when and how Sensitive Data is excluded is vital to ensuring ultimate compliance with applicable patient privacy laws, as well as the patient's right to confidentiality of the medical records.

Definitions:

Sending Participant shall mean the GNOHIE Participating Organization or Member that originates the Sensitive Data.

Sensitive Data shall mean genetic information including test results and consultations, adult and minor psychotherapy notes, all minor mental health records, and records from SAHMSA Part 2 Providers.

Policy:

A. Responsibility

1. Responsibility for restricting the transmission of Sensitive Data shall reside with the Sending Participant with assistance from GNOHIE.
2. GNOHIE shall work with Sending Participants on the proper removal of Sensitive Data and instruct on the GNOHIE's ability and limitations in suppressing such information.

B. Genetic Information

1. Sending Participant shall restrict the transmission of genetic information to GNOHIE.
2. In addition to Sending Participant's restriction of genetic information, genetic testing information will also be suppressed at the GNOHIE level. This includes, but is not limited to, genetic testing laboratory results, counseling sessions, and provider reports.
3. Suppression at the GNOHIE level shall be maintained using a list of applicable ICD-9 and CPT codes and keywords.

C. Psychotherapy Notes

1. The Sending Participant shall not include psychotherapy notes in a patient's electronic record shared through the GNOHIE.

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2. The GNOHIE shall not include psychotherapy notes of patients.
3. Data shall be suppressed at the GNOHIE level by filtering by site, provider and type of visit using CPT codes.

D. Minor Mental Health

1. Minor mental health data, not including psychotherapy notes, can only be shared among direct treatment providers

E. Substance Abuse Treatment Records

1. GNOHIE shall not permit any Substance Abuse and Mental Health Services Administration (SAMHSA) Part 2 providers to connect to GNOHIE.