

DEPARTMENT: Information Protection	POLICY DESCRIPTION: Confidentiality Statements
PAGE: 1 of 2	REPLACES POLICY DATED: 8/1/15, 1/1/16
EFFECTIVE DATE: January 15, 2016	REFERENCE NUMBER: IP.GEN.003
APPROVED BY: Ethics and Compliance Policy Committee	

SCOPE: All Company-affiliated facilities and Lines of Business including, but not limited to, hospitals, ambulatory surgery centers, imaging and oncology centers, physician practices, shared services centers, corporate departments, Groups, Divisions and Markets.

PURPOSE: The Company recognizes the importance of protecting the confidentiality of Company information. All individuals with access to Company information are responsible for the protection of such information. A confidentiality statement on applicable internal documents helps protect Sensitive Business Information (as defined below). This policy indicates when a confidentiality statement is required and how it should be utilized.

POLICY: Individuals must take reasonable and appropriate steps to protect Sensitive Business Information (defined below) used by Senior Leadership, Executive Management, or other members of the workforce to make strategic business decisions by including a confidentiality statement on internal presentation documents that contain such information.

DEFINITIONS

Sensitive Business Information: Non-publically disclosed information (e.g., marketing plans, financial information, outcomes data).

Internal Presentation Documents: Documents created for presenting Sensitive Business Information within the company for strategic business decisions by Senior Leadership, Executive Management, or other members of the workforce and not intended for external dissemination. May include, but is not limited to, documents, spreadsheets, and presentations. This does not include routine system-generated reports or email between workforce members.

PROCEDURE:

1. The following confidentiality statement must be placed on all Internal Presentation Documents containing Sensitive Business Information:

CONFIDENTIAL – Contains proprietary information. Not intended for external distribution.
2. The required confidentiality statement must be one of the following:
 - a. a watermark that runs diagonally across each page of the document, or
 - b. at the bottom of each page of the document in a font size that is clearly noticeable.
3. All Internal Presentation Documents will be expected to carry the confidentiality statement as soon as possible after the effective date of this policy.
4. For hospitals and other facilities that have one, the Facility Ethics and Compliance Committee (FECC), under the direction of the Ethics and Compliance Officer, is responsible for ensuring compliance with this policy. For entities that don't have an FECC, the Chief Executive Officer, Administrator or Practice Manager shall designate an individual to oversee implementation.



DEPARTMENT: Information Protection	POLICY DESCRIPTION: Confidentiality Statements
PAGE: 2 of 2	REPLACES POLICY DATED: 8/1/15, 1/1/16
EFFECTIVE DATE: January 15, 2016	REFERENCE NUMBER: IP.GEN.003
APPROVED BY: Ethics and Compliance Policy Committee	

REFERENCES:

1. [Code of Conduct](#), Confidential Information Section
2. Confidentiality and Security Agreement Policy, [IP.SEC.005](#)
3. IS Standard: Electronic Data Classification, [AM.IC.01](#)