Confidentiality Policy

1. **Purpose**
   To protect the confidentiality of all information obtained during the credentialing process and to maintain confidentiality of all practitioner/provider specific information.

2. **Policy**
   Priority Health will treat information it receives and maintains as part of its credentialing and recredentialing activities as confidential in order to maintain protection under Michigan and Federal Peer Review Protection Laws. Priority Health will not disclose information to individuals who are not members of the Credentialing Committee, the Medical Affairs Committee or the Board of Directors, except as permitted or required by supporting Credentialing policies and/or procedures or as required by State or Federal statutes, regulations, or judicial order. Priority Health will maintain all Medical Affairs Committee and Credentialing Committee documents in a secure manner in Priority Health's Credentialing Department.

   Priority Health will exercise due care with practitioner/provider specific information by keeping all practitioner/provider files in a secure area. Priority Health staff will not disclose practitioner/provider confidential or protected information to parties outside of the organization unless required by law in which case Priority Health Legal Counsel will be involved. Direct access to practitioner/provider files is limited to Credentialing team members. Other Priority Health personnel who are members of the Credentialing Committee, Priority Health Legal Counsel, Special Investigations Unit (SIU), and Credentialing Committee members will have access to practitioner/provider files via a Credentialing team member.

   All Priority Health employees sign a Confidentiality Statement upon employment. In addition, all Credentialing Committee members are required to sign a Confidentiality Agreement.

   Priority Health Credentialing department will maintain the complete file of all providers for a minimum of ten (10) years following termination from Priority Health. All provider files will be electronically stored or stored with Kent Records with a destroy date of ten (10) years.

3. **Revisions**
   Priority Health reserves the right to alter, amend, modify or eliminate this policy at any time without prior written notice.

   12**/**98 annual review; 5/99 revisions; 8/99 revisions, 11/99 revisions & annual review, 12/00 revision & annual review, 9/02 annual review, 10/02 annual review, 10/03 annual review, 10/04 revisions & annual review, 11/07 biennial review, 7/09 CMS revisions, 12-7-11, 8/14/19, review 8/29/23, 7/29/2025, 7/17/2026

4. **Policies Superseded and Replaced:** Formerly part of Policy #2/0030/R3 – Practitioner Credentialing, Recredentialing and Hearing Policy & Procedure.

5. **References**
   NCQA CR 1
   Priority Health Confidentiality of Medical Information
   Confidentiality Agreement with Third Parties
   Medicare Managed Care Manual
   Practitioner Credentialing Overview Policy
   Practitioner Recredentialing and Performance Monitoring Policy

Entities will reference associated Documentation contained within this document as applicable
Printouts of this document may be out of date and should be considered uncontrolled.