

Hospital Media Guide



**Understanding patient privacy rights and
communicating effectively with
Michigan hospitals**



MICHIGAN HEALTH & HOSPITAL ASSOCIATION

July 2009

Patient Privacy Rights: General Guidelines for Hospitals and the News Media

The purpose of this guide is to **assist hospital administrators, nurses, physicians, and the news media with the communication of facts and data regarding patients.** This section provides reporters with information regarding hospitals' legal and ethical responsibilities to patients in reporting admission, patient status and other patient data.

The federal Health Insurance Portability and Accountability Act of 1996 (HIPAA) mandated regulations that govern privacy, security and administrative simplification standards for personal health care information. HIPAA required major changes in how health care organizations handle all facets of information management and set forth minimum standards that hospitals and other health care providers must follow with regard to the release of patient information. **State and other federal law, as well as individual hospital policies, may establish stricter guidelines. In those cases, the more restrictive policy takes precedence.**

About the MHA

The Michigan Health & Hospital Association (MHA) represents all 144 community hospitals in the state and maintains a strong tradition of successfully advocating on behalf of hospitals and the patients they serve. The MHA addresses key issues in the legislative and regulatory arenas to advance initiatives that protect quality, cost-effective and accessible care. The association focuses its efforts in the areas of ensuring patient access, improving quality of care, pursuing community health improvement and protecting mission-driven funding.

Media Policy

The MHA is a statewide organization that can typically provide:

- comment on issues affecting hospitals or patients
- anecdotal or historical background
- general trend information (if applicable)
- comment on reports/studies that address health care

As a *statewide* organization, the MHA is unable to provide:

- comment on individual hospital business decisions
- hospital-specific data

Media calls to the MHA should be directed to Kevin Downey, assistant director, Public Affairs at (517) 703-8601 or kdowney@mha.org.

The Rights of Patients

Patients have specific legal rights to privacy as governed by several federal and state laws, as well as standards set forth by The Joint Commission (an accreditation and certification body for health care organizations and programs in the United States). Hospitals and the professionals working within their walls have both legal and ethical responsibilities to preserve patient confidentiality.

In addition, many Michigan hospitals have individual policies governing patient rights and responsibilities, which include confidentiality issues. This information is available by contacting the hospital's public relations department.

According to The Joint Commission, related patient rights include:

Respect and Dignity — The patient has the right to considerate, respectful care at all times and under all circumstances, with recognition of his/her personal dignity.

Privacy and Confidentiality — The patient has the right, within the law, to personal and informational privacy, as manifested by the following rights:

- to refuse to talk with or see anyone not officially connected with the hospital, including visitors, or persons officially connected with the hospital but not directly involved in his/her care
- to expect that any discussion or consultation involving his/her care will be conducted discreetly and that individuals not directly involved in his/her care will not be present without his/her permission
- to have his/her medical record read only by individuals directly involved in his/her treatment (or in the monitoring of its quality) and by other individuals only after his/her written authorization (or that of his/her legally authorized representative) is provided
- to expect all communications and other records pertaining to his/her care, including the source of payment, to be treated as confidential



Release of Patient Information

The HIPAA privacy regulations provide for the release of limited information about the patient when someone specifically asks about the patient by name. Unless a patient objects, the following information may be placed in a hospital directory:

- patient name
- patient location in the facility
- patient condition, described in general terms that do not communicate specific information about the individual
- patient religious affiliation (may only be released to clergy, who do not have to inquire about a patient by name)

If a patient is unable to communicate the denial or restriction of use of directory information, such information can be released only if the use or disclosure is consistent with any preference the patient expressed in the past and disclosure is in the best interests of the patient (in the professional judgment of the medical services provider).

Patient Condition

Only a physician can determine the patient's prognosis. Most physicians in hospitals use the following terms to describe a patient's condition:

- **Undetermined** — patient currently being evaluated
- **Good** — vital signs are stable and within normal limits; patient is conscious and comfortable; indicators are excellent
- **Fair** — vital signs are stable and within normal limits; patient is conscious, but may be uncomfortable; indicators are favorable
- **Serious** — vital signs may be unstable and not within normal limits; patient is acutely ill; indicators are questionable
- **Critical** — vital signs are unstable and not within normal limits; patient may be unconscious; indicators are unfavorable
- **Treated and Released** — received treatment, but not admitted
- **Treated and Transferred** — received treatment; transferred to a different facility

NOTE:

- The term "stable" should not be used as a condition, according to the American Hospital Association. Furthermore, this term should not be used in combination with other conditions that, by definition, often indicate a patient is unstable.
- With written consent from the patient, a more detailed condition statement can be drafted and approved by the patient or legal representative.
- The death of a patient is considered protected health information under HIPAA; however, the condition of death may be released for only those deceased patients who have not opted out of the hospital directory. Hospitals are advised to first notify the next of kin or legal guardian or make a reasonable attempt to do so. Information regarding the cause of death must come from the patient's physician, and its release must be approved by a legal representative of the deceased. When a death is investigated by the county coroner, questions about the cause of death should be addressed to the coroner. The coroner's office may also have information about which funeral home is handling arrangements for the deceased.

Rights of the News Media

Under HIPAA, media representatives have the same rights as anyone else to information contained in the hospital directory to the extent the patient has not limited or opted out of having that information made available. The fact that the media may know the name of a patient who may, for example, have been involved in an accident or a crime, **does not give them any additional rights with respect to confirming the patient's treatment, admission or other patient-related information.**

However, **HIPAA applies only to certain health care entities**, including hospitals, physicians with hospital admitting privileges, and emergency medical or ambulance personnel. Fire, police and other officials at the scene of an accident who are not governed by HIPAA regulations may be able to release additional information. Patients are also free to provide their own information.



Penalties for HIPAA Violations

- The federal government may impose criminal penalties of as much as \$50,000 and/or imprisonment for as long as one year.
- If the offense is one of disclosure under false pretenses, the federal fine is a maximum of \$100,000 and/or imprisonment for as long as five years.
- If the offense is committed with the intent to sell, transfer or use patient information for commercial advantage, personal gain or malicious harm, the federal fine is a maximum of \$250,000 and/or imprisonment for as long as 10 years.



Gaining Access to Hospitals & Patients

The hospital spokesperson is familiar with media requests and is the individual best suited to provide patient information, when appropriate, and to arrange interviews. Calls made to others in the organization will be routed to the official spokesperson.

Media representatives and photographers must contact the hospital spokesperson for access assistance. **Hospitals require that a hospital representative accompany news personnel at all times.** It is not possible to grant open access to some areas of hospitals due to laws and regulations. Areas most likely to fall in the restricted area category include operating rooms, intensive care units, maternity units, emergency departments, psychiatric departments, nurseries and substance abuse units. At times, circumstances may necessitate that other areas be designated as off-limits.

Written permission from the patient or patient representative is needed to obtain photos or interviews. Consent forms will be available through the hospital spokesperson. If the patient is a minor, permission must be obtained from a parent or legal guardian.

Hospital personnel and physicians with hospital admitting privileges may deny the media access to the patient if it is determined the presence of photographers or reporters would aggravate the patient's condition or interfere with appropriate clinical care.

Other Pertinent Federal and State Law

In addition to HIPAA, federal laws prohibit hospitals from releasing any information regarding a patient being treated for alcohol or substance abuse (The Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970; the Drug Abuse Office and Treatment Act of 1972; and 42 C.F.R. Part 2, 188). There are also various state laws that address privacy of health information, such as HIV and mental health statutes.

Frequently Asked Questions

Do reporters have the right to obtain information regarding a hospitalized patient?

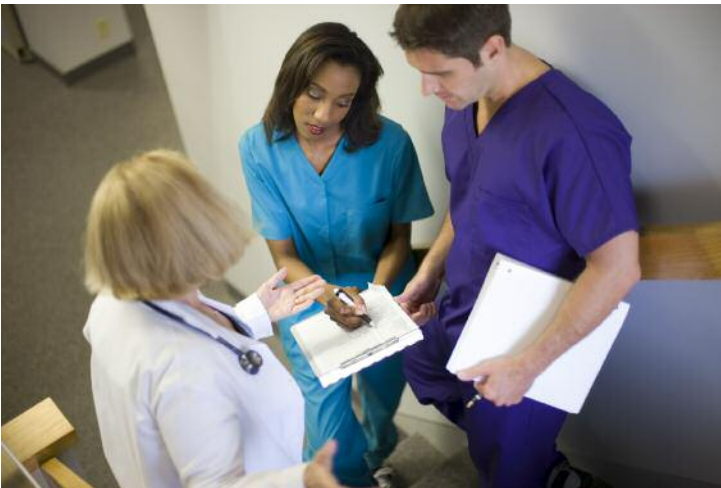
HIPAA requires that every patient be apprised of the hospital directory and its content, informed as to the types of entities and individuals that may receive the information upon request, and given the opportunity to restrict the type of information provided and to whom. (This may be done verbally.) Thus, if the patient has not restricted the hospital from releasing hospital directory information to the media and has been informed that such information is routinely released to the media, then the hospital may give the directory information (absent religious affiliation) to the media.

How should hospitals handle requests from news reporters regarding admissions, discharges, births and deaths?

This information should not be released to news reporters except as allowed in directory information under HIPAA.

If a hospital is obligated by statute to report certain information to a governmental agency, is the hospital then allowed to release that information to reporters?

No. There are numerous reporting statutes in Michigan requiring reports for child abuse, gunshot wounds, etc. The fact that a hospital has an obligation to report certain confidential information to a governmental agency, however, does not make that information available to media. The hospital may refer media to the public entity that receives such reports, such as the police, fire or health department. The public entity will be guided by the applicable statute as to whether it can release any or all of the information received.



If a patient arrives unconscious or is incompetent, may the hospital create directory information on that patient and release it to news reporters?

This practice requires discretion. The HIPAA regulations provide that, if the opportunity to “opt out” of the facility directory listing cannot practicably be provided due to the patient’s incapacity or emergency treatment situation, the facility may use or disclose some or all of the allowed information if such use/disclosure is consistent with a prior expressed preference of the patient that is known to the facility and if such use/disclosure is considered in the best interest of the patient as determined by the medical care provider. In these cases, the patient should be informed of the use/disclosure as soon as it is practical to do so.

Health care facilities should consider the following when deciding whether to include some or all of the patient information in the directory:

- whether disclosing that an individual is in the facility could reasonably cause harm or danger to the individual (e.g., if it appeared that an unconscious patient had been abused and disclosing the information could give the attacker sufficient information to seek out the person and repeat the abuse)
- whether disclosing a patient’s location within a facility implicitly would give information about the patient’s specific medical condition (e.g., whether a patient’s room number revealed that he or she was in a psychiatric ward)
- whether it is necessary or appropriate to give information about patient status to family or friends (e.g., if giving information to a family member about an unconscious patient could help a physician administer appropriate medications)
- whether an individual had, prior to becoming incapacitated, expressed a preference not to be included in the directory

If a reporter has a patient’s name and is calling to confirm that the patient has been treated or admitted or is asking for other information regarding the patient, may the hospital confirm the identity or respond to the specific questions?

The fact that the media may know the name of a patient who may, for example, have been involved in an accident or a crime does not provide additional rights with respect to confirming the patient’s treatment, admission or other patient-related information. The only rights they would have would be with respect to information contained in the hospital directory to the extent the patient has not limited or opted out of having that information made available.

If you have any questions regarding the information contained in this report, please contact the MHA Public Affairs division at (517) 703-8601. This MHA *Hospital Media Guide* is also available on www.MHA.org by clicking on “Newsroom” and selecting “Reports & Publications.”

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DEFINITION OF A MHA HEALTH CARE SYSTEM

Many Michigan hospitals are operated under a parent organization under a single license. The purpose of this list is to help media recognize the organizational structure of these health care systems thereby increasing the ease by which journalists navigate hospital communication channels. To qualify for membership, the parent organization must be headquartered in the state of Michigan. [excerpt from MHA Bylaws, Article III, Section 1 Membership, Subsection Type IA] Type 1A members that are not owned or operated by the health care system but have an association with that system are listed in italics.

BEAUMONT HOSPITALS

Beaumont Hospital-Grosse Pointe
Beaumont Hospital-Royal Oak
Beaumont Hospital-Troy

BORGESS HEALTH

Borgess Medical Center
Borgess-Lee Memorial Hospital
Borgess-Pipp Hospital
CareLink of Jackson

BRONSON HEALTHCARE GROUP INC.

Bronson LakeView Hospital
Bronson Methodist Hospital
Bronson Vicksburg Hospital

DETROIT MEDICAL CENTER

Children's Hospital of Michigan
Detroit Receiving Hospital & University Health Center
DMC Surgery Hospital
Harper/Hutzel Hospital
Huron Valley-Sinai Hospital
Rehabilitation Institute of Michigan
Sinai-Grace Hospital

GENESYS HEALTH SYSTEM

Genesys Regional Medical Center

HENRY FORD HEALTH SYSTEM

Henry Ford Cottage Hospital
Henry Ford Hospital
Henry Ford Kingswood Hospital
Henry Ford Macomb Hospitals
Henry Ford Macomb Hospital-Warren Campus
Henry Ford West Bloomfield Hospital
Henry Ford Wyandotte Hospital

LAKELAND REGIONAL HEALTH SYSTEM

Lakeland Community Hospital-Niles
Lakeland Regional Medical Center-St. Joseph
Lakeland Specialty Hospital-Berrien Center

MCLAREN HEALTH CARE

Bay Regional Medical Center
Bay Special Care Hospital
Ingham Regional Medical Center-Greenlawn Campus
Ingham Regional Orthopedic Hospital
Lapeer Regional Medical Center
McLaren Regional Medical Center
Mount Clemens Regional Medical Center
POH Regional Medical Center

MIDMICHIGAN HEALTH

Gratiot Medical Center
MidMichigan Medical Center-Clare
MidMichigan Medical Center-Gladwin
MidMichigan Medical Center-Midland

MUNSON HEALTHCARE

Kalkaska Memorial Health Center
Munson Medical Center
Otsego Memorial Hospital
Paul Oliver Memorial Hospital

OAKWOOD HEALTHCARE INC.

Oakwood Annapolis Hospital
Oakwood Heritage Hospital
Oakwood Hospital & Medical Center-Dearborn
Oakwood Southshore Medical Center

SAINT JOSEPH MERCY HEALTH SYSTEM

St. Joseph Mercy Hospital
St. Joseph Mercy Livingston Hospital
St. Joseph Mercy Saline Hospital
St. Mary Mercy Hospital
Trinity Health

SELECT MEDICAL CORPORATION

Select Specialty Hospital Macomb County
 Select Specialty Hospital-Ann Arbor
 Select Specialty Hospital-Downriver
 Select Specialty Hospital-Flint
 Select Specialty Hospital-Grosse Pointe
 Select Specialty Hospital-Kalamazoo
 Select Specialty Hospital-NW Detroit
 Select Specialty Hospital-Pontiac
 Select Specialty Hospital-Saginaw
 Select Specialty Hospital-Western Michigan

SPARROW HEALTH SYSTEM

Carson City Hospital
 Clinton Memorial Hospital
Ionia County Memorial Hospital Corporation
 Sparrow Hospital-Main Campus
 Sparrow Hospital-St. Lawrence Campus
 Sparrow Specialty Hospital

SPECTRUM HEALTH

Helen DeVos Children's Hospital
 Spectrum Health Blodgett Hospital
 Spectrum Health Butterworth Hospital
Spectrum Health Kelsey Hospital
 Spectrum Health Reed City Hospital
 Spectrum Health Special Care Hospital
Spectrum Health United Hospital
Spectrum Health United Memorial

SPECTRUM HEALTH UNITED MEMORIAL

Spectrum Health
 Spectrum Health Kelsey Hospital
 Spectrum Health United Hospital

ST. JOHN HEALTH

Brighton Hospital
 Providence Hospital & Medical Centers
 Providence Park Hospital
 St. John Detroit Riverview Center
 St. John Hospital & Medical Center
 St. John Macomb Oakland Hospital
 St. John North Shores Hospital
 St. John River District Hospital

ST. MARY'S OF MICHIGAN HEALTH SYSTEM

St. Mary's of Michigan
St. Mary's of Michigan Standish Hospital

TRINITY HEALTH

Battle Creek Health System
Mercy Health Partners, Hackley Campus
Mercy Health Partners, Lakeshore Campus
Mercy Health Partners, Mercy Campus
Mercy Health Partners, Muskegon General Campus
Mercy Hospital Cadillac
Mercy Hospital Grayling
Saint Joseph Mercy Health System
Saint Mary's Health Care
St. Joseph Mercy Hospital
St. Joseph Mercy Livingston Hospital
St. Joseph Mercy Oakland
St. Joseph Mercy Port Huron
St. Joseph Mercy Saline Hospital
St. Mary Mercy Hospital

UNIVERSITY OF MICHIGAN HEALTH SYSTEM

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