

## **FACILITY DIRECTORY**

### **Purpose**

To ensure that the maintenance of the facility directory at University of Southern California is in accordance with the HIPAA privacy regulations.

### **Policy**

1. **Maintaining Protected Health Information (PHI) for directory:**

USC University Hospital and Norris Cancer Hospital (Hospitals) may maintain some PHI as identified below for purposes of maintaining a facility directory if certain conditions are met as indicated in the procedures below.

2. **Information to be maintained:**

Hospitals may only maintain the following pieces of PHI in a facility directory in accordance with this policy:

- a. Name;
- b. Location in the facility (e.g., patient's room number);
- c. General description of the condition of the patient, which does not communicate specific medical information about the patient; and
- d. Religious affiliation.

3. **Access to information in directory:**

Information contained in the facility directory may be disclosed to any individual seeking information about the patient by the patient's name; except that religious affiliation will only be disclosed to members of the clergy.

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Issued by: Elizabeth Garrett  
Provost and Senior Vice President,  
Academic Affairs

Todd R. Dickey  
Senior Vice President, Administration

Date issued: November 15, 2011

## **Procedure**

1. Facilities may maintain some PHI as identified below only if it satisfies all of the following conditions prior to using or disclosing any of the patient's PHI for the purposes of maintaining a facility directory:
  - a. The patient is informed of the PHI that will be maintained.
  - b. The patient is informed of the persons to whom USC may disclose the PHI maintained in the facility directory (including disclosures to clergy of information regarding religious affiliation).
  - c. The patient is provided an opportunity to restrict or prohibit some or all of the uses and disclosures related to the directory.

### 2. When opportunity to object can be delayed

In the case of patient's incapacity or an emergency where a patient (or patient's personal representative) cannot practicably be provided an opportunity to restrict or prohibit some or all of the uses and disclosures related to the directory, Hospitals may make the uses and disclosures authorized by this policy if such uses and disclosures are consistent with the prior expressed preference of the patient that is known by Hospitals and are in the best interests of the patient as determined by Hospital staff in the exercise of professional judgment.

### 3. Opportunity given later

Where PHI is used or disclosed pursuant to #2 above, Hospital staff will inform the patient of such use or disclosure and provide the patient with an opportunity to object to such uses and disclosures for directory purposes as soon as practicable.

## **Additional References**

45 CFR §§ 164.510(a)

**Responsible Office:** Office of Compliance  
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