



ORGANIZATIONAL PRIVACY STANDARDS:

Verifying Patient & Member Identity Over the Phone

Definitions:

Caller means a person who calls HealthPartners or whom HealthPartners calls on the telephone to communicate Protected Information.

Basic Rules:

1. Protected Information may only be given over the phone if (A) the person receiving the information has a right to receive it, and (B) the identity of the person receiving the information has been verified. The standards described in *both (A) and (B)*, below, must be met.

(A) Callers only have a right to receive Protected Information if:

- The Caller is the **patient or member** who is the subject of the information;
- The Caller is an **authorized legal representative** of the person who is the subject of the information;
- The patient or member has **specifically authorized** the disclosure of the information to the Caller; or
- HealthPartners is otherwise **authorized by law** to release the information to the Caller.

(B) No Protected Information may be released to a Caller without first verifying the identity of the Caller by requesting the full name of the patient or member, plus *at least two (2)* of the following pieces of information:

- Membership/insurance ID number
 - Patient account number or medical record number
 - Claim number or Authorization number
 - Employer/group name
 - Name of research study (if applicable)
 - Date of birth (correct month, day and year)
 - One other piece of information that exists in our system, such as current address or phone number.
2. When you verify a Caller's identity, ask the Caller for the information you need; **DO NOT** tell the Caller the information and ask the Caller to confirm. Instead, compare the information the Caller reports with the information you have on record.
 3. If the information provided by the Caller does not match the information in our records, then the requested Protected Information should not be given to the Caller. Staff and providers should express an apology to the Caller and explain that that our privacy standards do not allow release of

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information if we are not able to verify the Caller's identity – and explain that this is for the protection of our patients and members. If a Caller gives you verification information that is almost – but not quite – correct, you may give the Caller an opportunity to correct the mistake, but do not suggest what the error is (for example, if a person seems to have transposed digits in an identification number, you can tell the Caller that the number is not correct and ask the Caller to read it again).

4. **SPECIAL NOTE FOR MINORS:** If the Caller is the parent or Guardian of a Minor and the Protected Information relates to the Minor's reproductive health (including contraception, pregnancy, STDs), Hepatitis B or chemical dependency, the Protected Information must not be disclosed without the Minor patient or member's written Authorization – *even if the caller provides the appropriate verification information.*

Exceptions:

1. If the Caller is personally known to a caregiver or business leader (supervisor or manager), and the caregiver or business leader believes, in his or her professional judgment, that the Caller is who they say they are, and is authorized to receive the Protected Information, the caregiver or business leader may disclose the information, subject to the following:
 - The caregiver or business leader must inform the Caller that caller verification information will be required in the future; and
 - Disclosure must be documented in the member or patient's record, including name of Caller, what information was disclosed, purpose of disclosure, and the fact that caller verification information will be required in the future.
2. If the Caller requests general information that is not specific to a particular patient or member, we can give that information to the Caller without verifying his or her identity (for example, clinic hours or days of the week a particular provider works).

Examples:

1. Member calls Member Services and asks for additional information on a claim received in the mail. The Member Services Representative should ask the member for her name and two additional pieces of identifying information (see list under *Basic Rules*).
2. Medical Office Assistant (MOA) calls patient's home to leave an appointment reminder. When someone at the house picks up the phone, the MOA asks for the patient. The person who picked up the phone asks who is calling, and the MOA says that he is calling for [patient name] with an appointment reminder from HealthPartners. If that person then begins to ask questions about the type of appointment, the MOA may not provide any information about the kind or location of the

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appointment. MOA should only leave his name and a call-back number. If the person who answered the phone claims to be the patient, MOA should get at least two pieces of identifying information (see list).

3. Nurse leaves a voicemail for a 16-year-old patient requesting a call back; parent calls back – identifies herself as the patient’s mother and provides two correct pieces of identifying information for the patient. If the information relates to a “sensitive service” (such as reproductive health or chemical health), the nurse must refrain from providing any information to the parent. If the information does not relate to a “sensitive service,” the nurse may provide the information to the parent.

Practical Tips:

1. There is no need to be shy about asking the Caller for their verification information. If you are polite but firm, most people will understand that we are doing this for the protection of our members and patients.
2. If a Caller is reluctant to provide the information, it is important to clarify why you are asking: To protect the patient or member’s privacy.
3. If you have left a message for a patient or member to call you, make sure to ask for the Caller verification information when the call is returned.
4. If you are concerned that the Caller is not who they say they are, even if they provide accurate verification information, you have a couple of good options:
 - Politely place the Caller on hold, explain your concerns to your supervisor and ask your supervisor to resume the call, or
 - Politely tell the Caller that you will call them back shortly and call back at a number we already have documented for that person in our system.

Important Reminder:

These are important standards for you to follow. If you don’t follow them, you may be subject to discipline.

Other Resources:

Organizational Privacy Standards: Special Privacy Considerations for Adolescents and Other Minors

Organizational Privacy Standards: Using and Releasing Protected Information (Consent/Authorization)