

**Government Business Division
Policies and Procedures**

Section (Primary Department) Utilization Management		SUBJECT (Document Title) Confidentiality in the Clinical Services Committee (CSC) - CA	
Effective Date 07/25/2012	Date of Last Review 04/08/2024	Date of Last Revision 03/31/2023	Dept. Approval Date 04/08/2024
Department Approval/Signature:			

Policy applies to health plans operating in the following State(s). Applicable products noted below.

Products	<input type="checkbox"/> Arkansas	<input type="checkbox"/> Iowa	<input type="checkbox"/> Nevada	<input type="checkbox"/> Tennessee
<input checked="" type="checkbox"/> Medicaid/CHIP	<input checked="" type="checkbox"/> California	<input type="checkbox"/> Kentucky	<input type="checkbox"/> New Jersey	<input type="checkbox"/> Texas
<input type="checkbox"/> Medicare/SNP	<input type="checkbox"/> Colorado	<input type="checkbox"/> Louisiana	<input type="checkbox"/> New York	<input type="checkbox"/> Virginia
<input type="checkbox"/> MMP/Duals	<input type="checkbox"/> District of Columbia	<input type="checkbox"/> Maryland	<input type="checkbox"/> New York (WNY)	<input type="checkbox"/> Washington
	<input type="checkbox"/> Florida	<input type="checkbox"/> Minnesota	<input type="checkbox"/> North Carolina	<input type="checkbox"/> West Virginia
	<input type="checkbox"/> Georgia	<input type="checkbox"/> Missouri	<input type="checkbox"/> Ohio	<input type="checkbox"/> Wisconsin
	<input type="checkbox"/> Indiana	<input type="checkbox"/> Nebraska	<input type="checkbox"/> South Carolina	

POLICY:

To ensure confidentiality, all internal members of the Clinical Services Committee (CSC) are required to review and abide by this confidentiality policy based on the organizations privacy and confidentiality processes. All external guests are required to sign the appropriate confidentiality documents based on the organizations privacy and confidentiality processes.

DEFINITIONS:

None

PROCEDURE:

Documents created as a part of the CSC process are confidential and are maintained in compliance with legal requirements and the Anthem Privacy Manual. These documents include program descriptions, quality improvement and utilization management studies including reports and recommendations, minutes of CSC meetings and subcommittees.

All internal Medicaid CSC members review and abide by the confidentiality policy annually. In addition, the chair of the CSC verbally reminds all committee members of the need to ensure that the topics discussed in the committee meetings shall remain confidential and will not be discussed outside the committee and that members must abstain from voting when they feel there is a conflict. The confidentiality reminder is documented in the committee meeting minutes.

External guests are required to review, abide by, and sign the confidentiality form annually.

A sample Confidentiality Agreement is attached.

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REFERENCES:

- 45 CFR Part 162.915(a), (b), (c), (d)
- Anthem Privacy Policy Manual v 11.1
- CA Department of Health Care Services (DHCS) Central Valley/Bay Area Contract : Exhibit A, Attachment 4, Section 4 ; Exhibit G, Section 4A-B
- CA: LA Care Contract: Article X, Section 10.03
- CSC Charter

RESPONSIBLE DEPARTMENTS:

Primary Department:

Utilization Management

Secondary Department(s):

Case Management

EXCEPTIONS:

None

REVISION HISTORY:

Review Date	Changes
04/08/24	<ul style="list-style-type: none"> • Annual Review; no changes
03/31/23	<ul style="list-style-type: none"> • Annual Review • Updated References section • Added "Secondary Department(s)" sub-header under Responsible Departments section to match template; added "Case Management (CM)" as a secondary department
03/24/22	<ul style="list-style-type: none"> • Annual Review • POLICY NAME CHANGE: "Confidentiality in the Utilization Management Committee - CA" to "Confidentiality in the Clinical Services Committee (CSC) - CA" • Updated UMC to CSC • Updated policy • Updated procedure • Placed references in alphabetical order • Updated Confidentiality Agreement – Anthem Committee Members/Guests

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Review Date	Changes
03/10/21	<ul style="list-style-type: none">• Annual Review, no changes
03/11/20	<ul style="list-style-type: none">• Annual Review, no changes
03/06/19	<ul style="list-style-type: none">• Annual Review, no changes
03/20/18	<ul style="list-style-type: none">• Annual Review, no changes
03/31/17	<ul style="list-style-type: none">• Annual Review, no changes
04/29/16	<ul style="list-style-type: none">• Annual Review• Changed WellPoint to Anthem
05/30/15	<ul style="list-style-type: none">• Created state specific document from business wide document

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Confidentiality Agreement – Anthem Committee Members/Guests

I recognize that during the course of participating in the Clinical Services Committee (CSC), it is possible that I may be exposed to Confidential and Proprietary information of Anthem. Confidential and Proprietary information includes, but is not limited to, information about Anthem’s customers and clients, and information not publicly available about Anthem’s development, purchasing, marketing, sales, provider contracts and costs, pricing, improvements, systems, operational areas, and ideas, (whether patentable or not) that are related to Anthem’s activities, and individually identifiable health and financial member information.

I agree that if I am exposed to Confidential and Proprietary Information, I shall not, whether during the participation on said committee or subsequent to participation in that committee, in any fashion, form or manner, either directly or indirectly use or disclose to any person any Confidential and Proprietary information, or any information of any kind concerning any matters affecting or relating to Confidential and Proprietary information, without prior written consent of an authorized representative of Anthem.

If you have previously signed a business associate agreement, the terms of that agreement still apply. This Confidentiality Agreement is not intended to, and does not replace the specific requirements regarding member information set forth in that business associate agreement.

Printed Name

Signature

Name of Company

Date