

<b>DEPARTMENT:</b> Ethics and Compliance	<b>POLICY DESCRIPTION:</b> Physician Access to the Internet
<b>PAGE:</b> 1 of 2	<b>REPLACES POLICY DATED:</b> 6/1/98, 7/8/98, 1/12/99, 12/15/99, 6/30/02, 10/15/02, 9/30/03, 9/1/2005; 1/1/06 (EC.013); 11/15/06
<b>EFFECTIVE DATE:</b> December 1, 2007	<b>REFERENCE NUMBER:</b> LL.026
<b>APPROVED BY:</b> Ethics and Compliance Policy Committee	

<p><b>SCOPE:</b> All Company-affiliated facilities, including but not limited to, hospitals, ambulatory surgery centers, outpatient imaging centers, physician practices, service centers, and all Corporate Departments, Groups, Divisions and Markets.</p>
<p><b>PURPOSE:</b> To authorize facilities to provide affiliated physicians with Internet access for professional use so long as such facilities have bona fide medical staffs and the purpose of accessing the Internet relates to patient care.</p>
<p><b>POLICY:</b> So long as a facility has a bona fide medical staff, the facility may provide physicians, including residents, fellows and faculty, with Internet access within the facility or remotely through a Virtual Private Network (“VPN”) or similarly protected method. Such physicians must be members of the facility’s medical staff and the stated intended use of the Internet be for medical research or other professional purposes. Such use must be conducted within the facility or via a remote location through the facility’s network and must be reasonably related to the provision of, or facilitate the delivery of, medical services at the facility. Physicians may only access the Internet through the facility’s network from outside the facility if the purpose of accessing the Internet is to access hospital medical records or information or to access patients or personnel who are on the hospital campus. Such Internet access must be offered to all medical staff members without regard to the volume or value of referrals or other business generated by the physician for the facility.</p> <p>An exception to this Policy must be obtained in writing from the Senior Vice President and Chief Ethics and Compliance Officer.</p> <p>Nothing in this policy prohibits an HCA employer from providing Internet access to its <b>employed</b> physicians. Employed physicians may be provided access to the Internet just as any other Company employee.</p>
<p><b>PROCEDURE:</b></p> <p>A facility may grant access to the Internet to physicians, including residents, fellows and faculty, who are members of the hospital’s medical staff provided that:</p> <ol style="list-style-type: none"> <li>1. such access is provided from within the facility or remotely through a protected method such as a VPN and is readily available to such physicians (e.g., a physician lounge, library, or computers in patient care areas);</li> <li>2. such access does not permit physicians access to restricted Company information;</li> <li>3. notices are posted at the relevant terminals advising that the access is for use related to the delivery of medical services at the facility only (e.g., research and review of relevant periodicals, studies and other clinical information);</li> </ol>

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4. the physicians are made aware of the Electronic Communications Policy (IS.SEC.002), particularly key points on appropriate uses of the Company network (e.g., unauthorized e-mail services are not to be accessed via the Internet on a facility terminal as these e-mail services may introduce viruses to the Company network);
5. the physician has signed an acknowledgment form as required in the Information Confidentiality and Security Agreements Policy (IS.SEC.005);
6. such Internet access is offered to all medical staff members without regard to the volume or value of referrals or other business generated by the physician for the facility;
7. such access is reasonably related to the provision of, or facilitates the delivery of, medical services at the facility;
8. such access is not offered or provided in exchange for the referral of business that is paid for by federally-funded payers; and
9. any remote access from outside the facility is only for the purpose of accessing hospital medical records or information or to access patients or personnel who are on the hospital campus.

**REFERENCES:**

42 U.S.C. §1320a-7b; 42 C.F.R. §1001.952(a)-(v); 42 U.S.C. §1395 nn; 60 Fed. Reg. 41914 (August 14, 1995); 63 Fed. Reg. 1659 (Jan. 9, 1998); 66 Fed. Reg. 856, 962 (Jan. 4, 2001), to be codified at 42 C.F.R. §411.357(m); 69 Fed. Reg. 16054 (March 26, 2004)  
Information Security - Electronic Communications Policy, [IP.SEC.002](#)