

APPENDIX B: Caller Anonymity

NCCIH Policy Number: 140-000

Subject: Caller Anonymity

Purpose: This policy will guarantee caller anonymity. Information Service staff shall handle all calls in a manner that is secure to the extent permitted by law.

Policy: Information Service staff shall neither request nor record the names or contact information (i.e., addresses, e-mail, and/or telephone numbers) of callers except in the following cases:

- Materials are to be sent to the caller.
- A followup call with additional information is necessary.
- The NCCIH Clearinghouse is participating in data collection efforts as directed by the Project Office and approved by the Office of Management and Budget.
- The caller has agreed to participate in a survey of the service or a research study that requires followup contact.
- There is a compelling legal, moral, or ethical reason to attempt to identify the caller and his/her address and/or phone number.

The contractor shall obtain Project Office approval to collect names and addresses of callers under any circumstances other than those described above.

It is **expressly forbidden** to use contact data that identifies callers. Contact information in the ITS database should be purged within 3 months. It is stored for the sole purpose to verify addresses in case of returns for inquiries where we send out materials. Contact information on paper ITS forms must be destroyed within 24 hours after the call and followup are completed.

The contractor is expressly forbidden to provide any information that identifies callers to individuals or departments in the parent institution except when there is a compelling legal, moral, or ethical reason to do so. When circumstances compel a breach of confidentiality, the reason must be clearly documented, justifiable, and approved by a supervisor or manager.

It is expressly forbidden for anyone other than the NCCIH Clearinghouse and Project Office staff to listen to calls to the NCCIH Clearinghouse.

Responsibilities/Authorities: The Information Services Manager is responsible for monitoring all Information Specialist activities.