

# HIPAA and Social Media and other PHI Safeguards

Presented by the UAMS HIPAA Office

May 2016

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# Social Networking



# Let's Talk Facebook

The Facebook logo, consisting of the word "facebook" in white lowercase letters on a dark blue rectangular background.

- More than 1 billion users (TNW, 2014)
- Half of all adult Facebook users have more than 200 friends. (Pew Research, 2014)

# Facebook

- When can you discuss patient information on Facebook?

Never.

- What about information that doesn't identify the patient?

Never.

# Twitter



- 645 million active users
- Almost half access Twitter via mobile devices

(Huffington Post, 2014)

# Blogs



- Over 156 million public blogs
- Healthcare blogs

# UAMS Policy 3.1.38

## Safeguarding PHI

- **Social Networking:**

Electronic Public Displays of **patient information** without Patient Authorization are prohibited. This includes the posting of photographs, video or any information about a UAMS patient through electronic means including, but not limited to, social networking sites; blogs; pinning; pinging; and tweeting. The only exception is a posting in response to a UAMS patient that gives no further information about the patient.

# Patient Identifiers

**There are 18 identifiers, and they apply to *patients, relatives, employers or household members of the patients***

- Name
- Address (street address, city, county, zip code (more than 3 digits) or other geographic codes)
- Dates directly related to patient
- Telephone Number
- Fax Number
- Email addresses
- Social Security Number
- Medical Record Number
- Health Plan Beneficiary Number
- Account Number
- Certificate/License Number
- Any vehicle or device serial number
- Web URL
- Internet Protocol (IP) Address
- Finger or voice prints
- Photographic images
- Any other unique identifying number, characteristic, or code (whether generally available in the public realm or not)
- Age greater than 89 (due to the 90 year old and over population is relatively small)



# UAMS Policy 3.1.23

## Reporting HIPAA Violations

- Any known or suspected violations of the HIPAA regulations or related UAMS policies and procedures must be reported in accordance with this Policy.
- UAMS workforce who report in good faith such known or suspected violations shall not be subjected to retaliation, intimidation, discrimination, coercion, or harassment as a result of their report.
- Violations of this policy, including failure to report, will be grounds for disciplinary action up to and including termination. Any sanctions that are applied will be documented.

# What Should You Do?

- Keep patient-related communications OFF the internet!
- Obtain written HIPAA-compliant Authorizations from patients if you are going to put their information online (contact the HIPAA Office for assistance).
- If you see a posting online that violates UAMS policy, get screen shots and any other information that helps us mitigate and respond to the violation, and report to the HIPAA Office or your supervisor immediately.

# “Reasonable Safeguards” 3.1.38

UAMS must take reasonable steps to make sure PHI is kept private

## Communicate Quietly

- Make it a habit – always lower your voice when discussing patient information.
- Try to discuss patients privately.
- Stop the conversation if someone walks up while giving report or rounding.



# Printed PHI

- Don't leave PHI "lying around" where others can see it.
- Don't put PHI, including patient stickers and medication labels, in the regular trash. Shred or place in the privacy bins.
- Obliterate patient information on IV bags or cover with the white labels from the Omnicel before placing in the regular trash.
- Do not remove PHI from UAMS

# Electronic PHI

Be aware of your computer screen

- Position your monitor or Computer on Wheels (COW) so the screen cannot easily be seen by passersby
- Minimize the screen if someone walks up
- Log off or lock your computer prior to stepping away from it
- Never share your password or use someone else's sign on information

# Photography – consent required

- Written patient consent is required for photos/video taken for the purpose of treatment, payment, and other health care operations such as teaching within UAMS.
- Written authorization is required for photos/video to be disclosed outside UAMS.
- Exception - When a parent requests UAMS staff to make photographs solely for their personal use (such as a baby book), UAMS is not required to obtain written consent prior to taking the photograph.
- Do not take photos with personal digital devices.

# Why would the HIPAA Office call me?

- Access to patient records is monitored
- If your name is on an audit report, and the appropriateness is not readily apparent to the auditors, you or your supervisor will be contacted
- This is routine follow-up and is done for physicians, students and staff.

# Why would the HIPAA Office call me?

- Access of patient records outside the performance of your job is prohibited
- This includes your own records and the records of:
  - Family
  - Friends and acquaintances
  - Co-workers
- Violations of UAMS HIPAA Policies are taken so seriously that your supervisor will be notified and must impose disciplinary action .



# Your HIPAA Office

HIPAA Office: (501) 603-1379

HIPAA Hotline: (501) 614-2187

Email: [hipaa@uams.edu](mailto:hipaa@uams.edu)

Website: <http://hipaa.uams.edu>

# Don't forget to take your online Required HIPAA Privacy and Security training

<http://hipaa.uams.edu/RequiredHIPAAPS2013/RequiredHIPAAPS2013.htm>



# HIPAA Office

 Search

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### HIPAA Office News

Check out the Latest UAMS Capsule! Safeguarding Printed PHI

Check out the March UAMS Capsule! Policy Desk Reference Updated

Check out the Latest HIPAA Star Recipients

Review the new UAMS HIPAA Policy (2.1.43 Phishing and Fraud)

[hipaa.UAMS.edu](http://hipaa.UAMS.edu)

*Confidentiality is a team sport; when we protect PHI, everyone wins!*



### Quick Links

Tips from IT Security on Protecting Your Personal Information from Phishing Attacks

Institutional Compliance Home Page

Drug Free Campus Program

DHHS Office for Civil Rights Compliance & Enforcement

UAMS Policies & Handbooks

UConnect Training & Tip Sheets

Welcome to the UAMS HIPAA Page, this is your resource to answer questions, find policies or forms, access training, contact us, and much more. Please look around. If there's anything else you would like to see on here, please contact our Webmaster at [dobbinswilliamn@uams.edu](mailto:dobbinswilliamn@uams.edu). If you need to contact a member of your HIPAA Team, we are here to assist you.

# Questions?

