

Safeguarding PHI Nutrition Services



UAMS HIPAA Office

May 2016

HIPAA (not HIPPA)

- What is HIPAA? The Health Insurance Portability and Accountability Act is a federal law that protects the privacy and security of patients' health information.
- How does HIPAA affect me? UAMS requires all workforce members to sign the UAMS Confidentiality Agreement, and to work together to protect the confidentiality and security of patient, proprietary, and other confidential information.

Why HIPAA Matters

- HIPAA is the law, but in the end protecting patient confidentiality is how we show we care.
- 99.2% of our patients - “It is important to me that members of my health team respect my privacy when I am at the hospital or clinic”

What is Protected Health Information?

PHI is any individually identifiable information, transmitted or maintained, that relates to:

- past, present or future physical or mental condition
- healthcare provided or
- payment for care

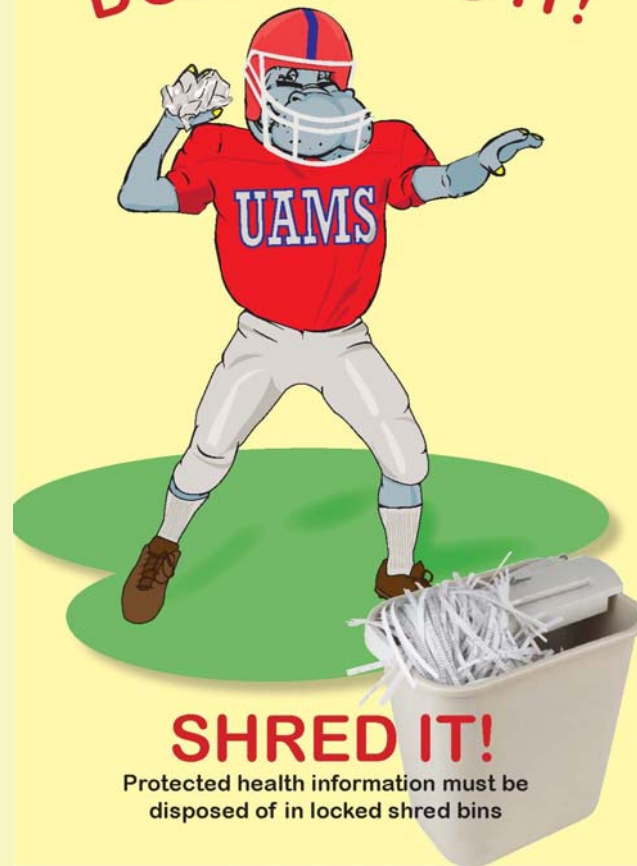
3.1.31 De-identification of PHI

- It isn't just a patient's name or social security number that has to be protected. Any of the items below can identify a patient . To be considered de-identified the following identifiers of the patient or of relatives, employers or household members must be removed:
 1. Name
 2. Geographic subdivisions smaller than a state
 3. All elements of dates except year
 4. Telephone and Fax numbers
 5. E-Mail, IP, and URL addresses
 6. Social Security Number
 7. Medical Record Number
 8. Health Plan Beneficiary Number
 9. Account Numbers
 10. Certificate/license Numbers
 11. Vehicle Identifiers and Serial Numbers
 12. Device Identifiers & Serial Numbers
 13. Biometric Identifiers, including finger and voice prints
 14. Full Face or other comparable photographic images
 15. Any other unique identifying number, characteristic, or code.

Guard PHI!

Harley says

DON'T TOSS IT!



SHRED IT!

Protected health information must be disposed of in locked shred bins

2.1.23 Safeguarding Policy

- Be sure and put any papers containing patient information in the designated shred bins. This includes patient labels and anything that accompanies a patient tray that includes a patient identifier such as name or MRN.
- If you find PHI, such as a patient list or part of a patient's record in the cafeteria or other inappropriate locations, take the information to your manager so they can notify the HIPAA Office.
- If you find PHI in wastebaskets or in trash bags, notify your manager right away so they can notify the HIPAA Office immediately.
- Our number is 603-1379

Sample papers containing PHI

UAMS OP Admin Staff
4301 West Markham Little Rock, AR 72205
Fax:

April 25, 2011
Page 1
Chart Document

Abble Uamstost MedRec: 1191543 PCP: None LDC: TMED Inp: QUALCHOI (263)
88 Years Old Female (DOB: 01/15/1928) Home: (501)555-5555 Work: (501)555-1551X131 eMail: ATU@UAMS.EDU

08/14/2010 - Hospital Admission: Hospital H&P
Provider: Ramon A Vista, MD, Resident
Location of Care: Family Medical Center

History of Present Illness
History from: patient
Chief Complaint: yys
History of Present Illness: kskkssss

Past, Family, and Social History
Past History (reviewed - no changes required): ANGINA PECTORIS (ICD-413.9)
ANOREXIA (ICD-783.0)
ALZHEIMER'S DISEASE (ICD-331.0)
DEMENTIA, WITH PSYCHOSIS (ICD-290.9)
WEIGHT LOSS, RECENT (ICD-783.21)
HYPERTENSION (ICD-401.9)

STAV

Carpal Tunnel Release:
Knee Arthroscopy
Hx of Peripheral Vascular Disease

Family History (reviewed - no changes required): Mother died stomach cancer. Father killed MVA. All sibs deceased, unknown causes.

Social History (reviewed - no changes required): Lived Independently prior to hospitalization. Two daughters, both work. More involved in care since R hospitalized.

Risk Factors
Tobacco use: prev.
Alcohol use: no
Seatbelt use: 75 %

Review of Systems
General: Denies fevers, chills, sweats, anorexia, fatigue, malaise, weight loss.
Respiratory: Denies cough, dyspnea, excessive sputum, hemoptysis, wheezing.
Gastrointestinal: Complains of diarrhea.
Genitourinary: Denies vaginal discharge, incontinence, dysuria, hematuria, urinary frequency, amenorrhea, menorrhagia, abnormal vaginal bleeding, pelvic pain.

Vital Signs
Height: 63.0 inches
Temperature: 98.6 degrees F
Pulse rate: 98

Physical Exam
General appearance: well nourished, well hydrated, no acute distress

Dr. Johnson

* Doe, John 1/1/36
HTN, Etch Hx 180/108 BP

Meds
Lisinopril, Plavix, Metformin

* Duck, Donald 1/1/51
Diabetes, HTN, LDL = 100
136/94 BP

Dr. Kent

* Mouse, Mickey 1/5/27, 140/109 BP
Cardiac Syndrome Enzymes ↑

Meds
Simvastatin, Coumadin, Kalin

Labs requested 4/15/11



If you find a patient list on a table in the cafeteria, what should you do?

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

Communicate Quietly

- Try to discuss patients privately.
- Make it a habit – always lower your voice when discussing patient information.
- Stop the conversation if someone walks up.
- Follow Vocera Communication guidelines
- If you hear confidential patient information, keep it to yourself

3.1.25 Minimum Necessary Policy

- Employees may not access patient information except to meet needs specific to their job/position.
- For example, you shouldn't read any patient information you might encounter while on the nursing unit or in Nutritional Services Administrative areas.
- If the nurses and doctors are discussing a patient, "move on" and don't try to overhear. Never repeat any patient information you do happen to hear.

3.1.20 Release of Patient Directory Information

- If a visitor asks you for a location of a specific patient, do not automatically tell them even if you know. For example, if you are working on 6C and someone asks if you know what room John Doe is in, you would not tell them because that patient may not want that information shared.
- Instead you should take them to the nurses station or the patient information desk or direct them there in a courteous and friendly manner. Of course, it is always fine to assist with general directions such as “where is E5 or “can you tell me where the Dermatology Clinic is?”



A visitor to the unit stops and asks
for a patient's room what do you do?



3.1.17 Mobile Device Safeguards

- A mobile computing device can contain PHI. If you find any mobile computing device like an iPhone or other cell phone, Thumb Drive or laptop that has been left behind by mistake, take the device to your manager for safekeeping.
- They will need to call the UAMS Police Department at 686-7777.



What do you do if you find a mobile device that has been displaced or lost?

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.
- Employees may not take photos with personal digital devices.

2.1.01 Confidentiality Policy

- Confidential information must be protected.
- Unlawful or unauthorized access, use or disclosure of confidential information is prohibited.
- For example, you cannot tell a friend or co-worker about someone being a patient in our hospital or clinic even if you don't give any other information about them.
- Remember that the patient identifiers apply to family members and employers so you also need to be cautious about sharing any information about visitors you encounter in our food service areas such as the cafeteria, Lobby Café, etc.





You are having lunch with a friend, and they begin talking about a patient that you know is hospitalized here. They begin to ask you questions about the patient. What do you tell your friend?



Social Networking

Do not post photographs, video or any information about a UAMS patient through an electronic means such as social networking sites, blogs, pinging and tweeting.

Reporting potential violations

- All known or suspected HIPAA violations or breaches must be reported.
- There will be no retaliation for good faith reporting.
- Reports can be made to:
 - Reporting line at 1-888-511-3969
 - HIPAA Office at 501-614-2187
 - Incident Report Link online at hipaa.uams.edu
 - Anyone in a position of responsibility - the person receiving the report should then contact the HIPAA Office.

www.hipaa.uams.edu

The screenshot shows a web browser window displaying the UAMS HIPAA Office website. The browser's address bar shows the URL <http://hipaa.uams.edu/>. The website header includes the UAMS logo (University of Arkansas for Medical Sciences) and the text "HIPAA Office". A navigation menu is visible with the following items: Home, Required Privacy & Security Training, **Report an Incident** (circled in red), Policies, Forms, Education & Training, and Contact Us. Below the navigation menu, there is a "HIPAA Office News" section with several news items. A central blue box contains the text: "hipaa.UAMS.edu Confidentiality is a team sport; when we protect PHI, everyone wins!". To the right of this box is a cartoon character of a rhinoceros in a suit. A dropdown menu is open under "Education & Training", listing various resources such as "Online Module", "Troubleshooting Guide & FAQ", "UConnect Training & Tip Sheets", "HIPAA Required Privacy & Security Training", "Level I HIPAA Training", "HIPAA Law Enforcement Training", "Past Inservices", "HIPAA Office Publications", "ROI Guide", and "ROI Guide for Billing". The browser's status bar at the bottom shows the URL https://secure.uams.edu/HIPAAReport/Report_Incident.html.



Questions?

If you have questions or concerns, contact the
HIPAA Office, or the HIPAA hotline at:

(501) 603-1379

1-888-511-3969

www.hipaa.uams.edu

Your HIPAA Team

- **Heather Schmiegelow**, UAMS HIPAA Campus Coordinator
(501-603-1379)
- **Anita Westbrook**, Medical Center Privacy Officer
(501-526-6502)
- **Jennifer Holland**, Research Privacy Officer (501-526-7559)
- **Steve Cochran**, Security Officer (501-603-1336)
- **Bill Dobbins**, Informatics Manager & Auditor (501-526-7436)
- **Sara Thompson**, HIPAA Compliance Manager (501-614-2098)
- **Brittany Parker**, Office Manager/Education Coordinator
(501-603-1379)

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