

HIPAA PRIVACY TRAINING UPDATE

Gloucester County Public Schools
2020-2021

WHAT IS HIPAA?

- Health Insurance Portability & Accountability Act
 - Establishes federal rights regarding:
 - Portability and nondiscrimination in health insurance coverage and
 - Privacy of health insurance information
 - Covers:
 - Health plans & service providers
 - Security
 - Data standardization

WHAT IS PROTECTED HEALTH INFORMATION (PHI)?

- Individually identifiable information such as:
 - Name
 - Employee contribution amounts
 - SSN
 - Date of service
 - Address
 - Diagnosis
 - Date of birth
 - Place of treatment
 - Sex
- Regarding past, present or future health care or condition
- Maintained or transmitted by the health care plan

FORMS OF PHI

- Paper
- Oral
- Electronic
- Fax
- Voice Mail

EXAMPLES OF PHI

- Health enrollment application
- Explanation of Benefits (EOB)
- Medical bills
- Conversations regarding diagnosis or condition

EXAMPLES OF PHI HANDLED BY SCHOOL NURSES

- Pertaining to Employees
 - Blood pressure checks
 - Medical advice
- Pertaining to Students
 - Student records
 - Electronic Medicaid filing
 - Must also follow Family Educational Rights and Privacy Act (FERPA) guidelines

RULE OF THUMB

- Individual sites/departments should not retain PHI only Payroll Specialist, Lydia Gilbert may retain PHI
- All requests for PHI should be directed to Budget & Finance
- Treat all health information as it were PRIVATE regardless of whether it is HIPAA protected

WHAT IS EXPECTED OF YOU?

- Safeguard all Health Information
- Report Any Privacy Violations to H/R and Budget and Finance

HOW SHOULD DOCTOR NOTES BE HANDLED ?

- Doctors notes should be turned into your supervisor and they will review it, place in a sealed envelope, mark it confidential, and forward it to the Budget and Finance Office Attn: Lydia Gilbert.

HOW SHOULD YOU PROTECT PHI ?

- Paper form
 - Transmitted via pony
 - Seal in an envelope
 - Clearly designate a recipient
 - Mark envelope confidential

HOW SHOULD YOU PROTECT PHI ? (CONT'D.)

- Oral
 - Speak in a low voice
 - Close the door
 - Do not relay information regarding the condition of others without their permission
 - With employee permission, relay minimal information

HOW SHOULD YOU PROTECT PHI ? (CONT'D.)

- Electronic
 - Lock your computer screen (CTL/ALT/DEL) when leaving your work area
- E-mail
 - Verify e-mail address
 - Turn your computer screen so it is not visible to a passerby
 - Delete e-mail after appropriate action is taken
 - Use confidentiality notice with all e-mail as follows

HOW SHOULD YOU PROTECT PHI ? (CONT'D.)

- E-mail (cont'd.)
 - **CONFIDENTIALITY NOTICE:** This message, including any attachments, may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient (or authorized to act on behalf of the intended recipient) of this message, please do not disclose, forward, distribute, copy, or use this message or its contents. If you have received this communication in error, please notify us immediately by return e-mail and delete the original message from your e-mail system. Thank you.

HOW SHOULD YOU PROTECT PHI ? (CONT'D.)

- Fax transmission
 - Use fax machines with restricted access
 - Shred documents after transmission is verified
 - Do not leave documents unattended
 - Use confidentiality notice with faxes as follows

HOW SHOULD YOU PROTECT PHI ? (CONT'D.)

- Fax transmission (cont'd.)

CONFIDENTIALITY NOTICE:The documents accompanying this fax transmission may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient (or authorized to act on behalf of the intended recipient) of this message, please do not disclose, forward, distribute, copy, or use this message or its contents. If you have received this communication in error, please notify us immediately by telephone and destroy the original. Thank you.

HOW SHOULD YOU PROTECT PHI ? (CONT'D.)

- Voice mail
 - Do not use speaker phone
 - Delete messages after appropriate action is taken
 - Do not share your passcode for retrieving messages with others

NOTICE OF PRIVACY

- Gloucester County Public Schools Notice of Privacy covers how we protect employees PHI and provides avenues to report violations.
 - It is available to all participants of health, dental and flexible benefits plans
 - Available on the web and in the Budget & Finance Office
 - Refer any questions to Budget & Finance

STORAGE OF PROTECTED HEALTH INFORMATION

- Do not retain documents unless necessary
- Paper records
 - Only the Office of Human Resources and Budget & Finance will store documents in locked files
 - Do not leave in view of others
- Electronic
 - Data should be password protected
 - Accessed by a limited number of people

RELEASE OF INFORMATION

- Refer requestor to Budget & Finance
- Budget & Finance will do the following:
 - Verify identity of individual requesting information
 - Provide information on a need to know basis
 - Divulge minimum information necessary
 - Err on the side of caution

RELEASING INFORMATION TO OTHERS

- Budget & Finance may release information to the following individuals in certain circumstances:
 - Family members
 - Power of attorney
 - Legal guardian
 - Court
 - Supervisors

RECORDING REQUESTS FOR INFORMATION

- Budget & Finance must:
 - Log requests
 - Determine if authorization is required from the employee
 - Examples not requiring authorization from the employee
 - Treatment, payment or health operations
 - Required by law
 - Public Safety
 - National Security

DISPOSING OF INFORMATION

- Shred paper documents
- Delete e-mail
- Delete voice mail
- Scrub hard drive when computers are removed

TECHNOLOGY DEPARTMENT RESPONSIBILITIES

- Understand what information is protected
- Restrict access
- Notify privacy official or deputy privacy official of any inappropriate requests
- Scrub hard drives of old computers
- Develop firewalls and password protection

PRIVACY OFFICIALS

- Privacy Official
 - Superintendent 804-693-1425
- Deputy Privacy Officials
 - Chief Financial Officer 804-693-7811
 - Executive Director H/R 804-693-7902
 - Finance Specialist 804-693-7817

COMPLAINTS

- Privacy Official
 - Superintendent
- U.S. Department of Health & Human Services
(written)