

READING HOSPITAL SCHOOL OF HEALTH SCIENCES POLICY NO. 309

SUBJECT: Confidentiality of Protected Health Information

Responsibility of: RSHS Program Directors
Revised: February 2020 Reviewed:

SCOPE: Students enrolled at the Reading Hospital School of Health Sciences (RSHS).

PURPOSE: To provide guidance to students regarding the protection and confidentiality of patient data.

POLICY: As part of academic and clinical responsibilities, students may be required to gather patient data in preparation for, during, or after their clinical/field experiences. The sources of the patient data may include, but are not limited to, the current health record, past health records, computerized data, and information obtained when interviewing the client. Personal identifiable information is not to be removed from the clinical setting. It is the student's responsibility to protect the confidentiality of the patient and to insure that all data used for the purpose of learning is de-identified before leaving the clinical site (i.e. any data removed from the clinical site should not be able to be traced back to the patient.). Students are responsible for safeguarding all Protected Health Information (PHI) and are permitted to obtain or release PHI only when a "need to know" has been clearly identified. PHI may not be disclosed in any form or in any manner (electronically, written, or orally).

DEFINITIONS:

Protected Health Information (PHI) - The definition of PHI includes any individually identifiable health information. PHI includes information gathered as part of the patient care process and includes, but is not limited to:

1. Name
2. Geographic subdivision smaller than state
3. Zip code
4. Elements of date directly related to an individual (i.e. date of birth)
5. Telephone numbers
6. Fax numbers
7. E-Mail addresses
8. Social security numbers
9. Medical record numbers
10. Health plan numbers
11. Patient account numbers
12. Patient account numbers
13. Certification of license numbers
14. Vehicle identifiers
15. Device identifiers (i.e. serial number of a pace maker)

16. URL's
17. IP addresses
18. Biometric identifiers
19. Images of any type

PROCEDURE:

In the process of accessing and utilizing patient data during clinical experiences, students gain access to a patient's PHI.

It is the policy of the School to safeguard all confidential information. Students are required to follow all HIPAA regulations and policies related to confidentiality and protection of PHI, in the institution/agency in which the clinical experiences occur.

The information gathered by students during clinical research/preparation and during all clinical experiences is restricted to that confidential information which satisfies a "need to know" basis. "Need to know" refers to only that information which is necessary in carrying out academic responsibilities.

- Students are permitted to acquire patient information only for those patients to whom the student is assigned, and is limited to only that information which is necessary to complete patient care and academic responsibilities.
- Students are required to remove all identifiable data (names, MRN, etc.) from all copies of confidential data used for clinical preparation or other academic use. Patients are to be identified by initials only.
- Students utilizing Reading Hospital computerized client data are required to abide by all policies and procedures related to confidentiality and use of computer system, user ID, and passwords.
- Students are required to dispose of all hard (paper) copies of PHI in an appropriate manner (paper refuse containers for eventual shredding are located in all clinical units). All hard (paper) copies of PHI used for clinical preparation must be appropriately discarded or returned to the clinical instructor at the time of the clinical experience.

HIPAA regulations (section 164.501) permit student access to Protected Health Information (PHI). Access to PHI is permitted when "conducting training programs in which students trainees, or practitioners in areas of health care learn under supervision to practice or improve their skills as healthcare providers..." Several Reading Hospital policies and procedures are available to assist in defining student use of PHI.

Copies of RH/Tower Health policies are available to students and faculty on the Reading Hospital intranet.

Unauthorized access, use, modification, disclosure, or improper disposal of confidential information is strictly prohibited and could result in disciplinary action up to and

including dismissal from the program.

EDUCATION AND TRAINING: NA

REFERENCES: NA

COMMITTEE AND COUNCIL APPROVALS: RHSHS Directors Meeting, February 2020

CANCELLATION: Reading Hospital or Tower Health policies directly related to this topic shall supersede this RHSHS policy. This policy supersedes all previous policies, memoranda, and/or other communications pertaining to this policy.