

STUDENT SUMMARY:

**Appropriate Uses of Protected Health Information
for EDUCATIONAL PURPOSES**

The use/disclosure of health information for educational purposes is considered to be one of the facility’s health care operations. As such, patient health information can be used by and disclosed to healthcare students without the patient’s consent, agreement or authorization.

However, there are other requirements of HIPAA that place limitations or parameters around that use.

- The facility must make sure that there are appropriate access controls in terms of student access to PHI.
- PHI disclosed should be limited to the minimum necessary for the particular educational use/purpose.
- Students who access PHI have the responsibility to protect and safeguard that information and make sure that any notes or class documents that contain PHI are disposed of appropriately upon completion of the use/purpose.

The collaborative facilities permit a student to use PHI that has been “facially de-identified” for his/her educational purposes.

The only difference between de-identified information and “facially de-identified” information is that “facially de-identified” information can include the patient’s medical record number, dates of service and zip code. All other individual identifiers (see slide 5) must be removed from the information.

Under HIPAA, “facially de-identified” information is still considered PHI. You must protect “facially de-identified” information in compliance with the Privacy Rule.

This table lists the identifiers which must be removed from the PHI in order for the information to be considered “facially de-identified”.

<ul style="list-style-type: none"> ■ Name ■ Address ■ Phone & fax number ■ E-mail address ■ SSN ■ Health plan beneficiary numbers ■ Account numbers ■ Certificate/license numbers ■ Web URLs 	<ul style="list-style-type: none"> ■ Vehicle identifiers and serial numbers ■ Device identifiers and serial numbers ■ IP address numbers ■ Biometric identifiers (including finger, voice prints) ■ Full face photo and other images ■ Any other unique identifier
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Allowable educational access/use

This table lists the types of educational uses or activities for which a student may access PHI.

<ul style="list-style-type: none"> ■ Treatment ■ Observation ■ Teaching Rounds ■ Retrospective Record/Data Reviews ■ Research (with IRB approval) ■ Case Presentations ■ Patient Logs
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Access to PHI or an attempt to access PHI by a student for a use or activity other than what is listed above would be considered a violation of the facility’s policies and could result in sanctions against the student.

Some Do's and Don'ts: Treatment and Observation

Here are some do's and don'ts relating to appropriate use/access of PHI for treatment and observation. This is not a complete list but will provide you with some general guidelines.

<p><u>Can Do</u></p> <ul style="list-style-type: none"> ■ Access medical records of the patients you are treating/caring for ■ Prepare class work with patient identifiers removed ■ Observe patient care with approval from department manager/ supervising faculty 	<p><u>Cannot Do</u></p> <ul style="list-style-type: none"> ■ Obtain medical records of patients you are not treating/caring for ■ Use data obtained from your cases with patient identifiers such as name, address, birth date left in ■ Observe patient care without appropriate approval or where the patient objects
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Some Do's and Don'ts: Teaching Rounds

Here are some do's and don'ts for participation in teaching rounds.

One important point must be emphasized. Always use discretion and common sense when discussing cases in public areas. Do not verbalize details that would inappropriately disclose patient information.

<p><u>Can Do</u></p> <ul style="list-style-type: none"> ■ Share patient information during teaching rounds ■ Prepare class work using data from your cases with patient identifiers removed 	<p><u>Cannot Do</u></p> <ul style="list-style-type: none"> ■ Discuss patients in public areas with no consideration to surroundings ■ Include family members in rounds, unless patient has agreed or determination has been made by physician that inclusion is in patient's best interest
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See the entire HIPAA Training Program at: http://www.hawaii.edu/hrc_training/

When in doubt, Do NOT disclose!