




Vinson Memorial Hospital  
We Care For You

 Vinson Memorial Hospital We Care For You	<u>Effective Date</u>		
	<b>July 2007</b>		
	<u>Number</u> <b>HP 002</b>	<u>Replaces Policy</u>  <b>NEW</b>	
<u>Title</u> <b>Patient Privacy Protection</b>	<u>Date Revised</u> <b>July 2007</b>	<u>Date Reviewed</u>	<u>Next Scheduled Review Date</u> <b>July 2010</b>
<u>Signature</u>  _____	<u>Scope of Responsibility</u>  <b>HIPAA/Compliance</b>		
<b>Chief Privacy Officer</b>			

**PURPOSE:** To provide guidance regarding each individual's responsibility related to identifiable patient information. This policy addresses intentional or unintentional breach of patient confidentiality, **including oral, written and electronic communication**. This definition will safeguard patient privacy and help minimize exposure and/or liability to individuals, facilities, and IMH. Each individual is responsible for adhering to this policy by using only the minimum information necessary to perform his or her responsibilities, regardless of the extent of access provided or available.

To establish the requirements for IMH to protect patients' privacy rights and their individually identifiable health information as required by the Health Insurance Portability and Accountability Act (HIPAA), Standards for Privacy of Individually Identifiable Health Information, 45 CFR Parts 160 and 164 and all Federal regulations and interpretive guidelines promulgated thereunder.

**POLICY:** Only individuals with a legitimate "need to know" may access, use or disclose patient information. This includes all activities related to treatment, payment and health care operations on behalf of IMH. Each individual may only access, use or disclose the minimum information necessary to perform his or her designated role regardless of the extent of access provided to him or her.

**DEFINITION:** For the purpose of this policy, **protected health information** means any individually identifiable health information collected or stored by IMH. **Individually identifiable health information** includes demographic information and any information that relates to past, present or future physical or mental condition of an individual.

**PROCEDURE:** This policy is based on the following principles related to the access, use and disclosure of patient information.

1. Individuals acting on behalf of IMH must always use only the minimum amount of information necessary to accomplish the intended purpose of the use, access, or disclosure.

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2. With respect to system access, patient privacy will be supported through authorization, access, and audit controls (e.g., roles-based access) and should be implemented for all systems that contain identifying patient information. Within the permitted access, an individual system user is only to access what they need to perform his or her job.
3. The Chief Privacy Officer (CPO) has the responsibility of facilitating compliance with these principles in conjunction with the Chief Compliance Officer.
4. Each individual is responsible for attending ongoing education on patient privacy and patient rights as directed.
5. Each individual is responsible for compliance with these Patient Privacy Policies and principles.
6. Enforcement will be consistent with the IMH Code of Conduct and IMH policies and procedures.