Training Objectives

After completion for this training, individuals should:

- Understand what HIPAA is.
- Know the meaning of Protected Health Information (PHI).
- Understand the significance of (TPO) Treatment, Payment and Operations – and why it is important.
- Understand Patient Rights.
- Understand the consequences of non-compliance with the law.
- Recognize the importance of making a commitment to protect patient rights and confidentiality.
What is HIPAA?

Mayo Clinic has a strong tradition of protecting the privacy of patient information. Confidentiality has always been part of the hospital culture; however, there is now a law that sets a National Standard to protect medical records and other protected health information. This law is called HIPAA (Health and Insurance Portability and Accountability Act).

• The HIPAA law was passed by congress in 1996.
• HIPAA sets national standards for the protection of patient information.
• HIPAA applies to all health care providers and the individuals performing work in them including, hospitals, physicians, insurance companies, labs, home care companies, and surgery centers.
• HIPAA covers all forms of protected health information whether it be oral, written, or electronic.

Why are volunteers required to have HIPAA training?

It is everyone’s responsibility to take the confidentiality of patient information seriously. Anytime volunteers come in contact with patient information, or any protected health information—written, spoken, or electronically transmitted, they are required to follow HIPAA regulations. The law requires awareness training for all healthcare personnel, including volunteers.
What is PHI (Protected Health Information)?

According to HIPAA documentation all of the following information can be used to identify a patient, and therefore must remain confidential.

- Address(es) (Home, email, Internet)
- Dates (birthdate, dates of service, etc.)
- Telephone or fax numbers
- Social Security Numbers
- Medical records numbers
- Patient account numbers
- Insurance Plan Numbers
- Vehicle Information
- License Numbers
- Medical Equipment Numbers
- Photographs
- Fingerprints

This information is referred to as individually identifiable health information (IIHI). Removing a patient name from a chart is no longer sufficient to protect or de-identify the patient. HIPAA refers to this information as PHI or Protected Health Information.
What is TPO (Treatment, Payment and Operations)?

HIPAA allows healthcare providers to share patient information for:

**Treatment** — Providing care to patients

**Payment** — To bill and be paid for patient care services

**Operations** — Normal business activities such as quality improvement, training, auditing, customer service and resolution of grievances.

With consent, HIPAA allows for the healthcare provider to use patient information for the purposes of Treatment, Payment, and Operations (TPO). *Patients must give prior consent or authorization for the use of their health information for non– TPO purposes before their information can be shared with anyone!*

Under the Minimum Necessary Rule– healthcare workers, including volunteers should only have access to the information they need to fulfill their assigned duties.

**If Protected Health Information (PHI) is involved:**

Stop and ask yourself if sharing the information is part of TPO (Treatment, Payment or Operations)? If not– Do not pass it along.

This includes information you may see or hear about hospitalized volunteers, neighbors, friends, acquaintances or well known individuals. Sharing information for non-TPO purposes REQUIRES (by law) authorization from the patient.
Scenarios To Consider

#1 During the course of your regular volunteer duties you enter a patient room and find a fellow volunteer who has been hospitalized.

**OK to:** Converse with the volunteer as you would normally do with any other patients as part of your routine duties.

**Not OK to:** Talk with others about the hospitalized volunteer even with the other volunteers or the volunteer office, unless you have been authorized by the patient to do so! (If they request this, it might be best to suggest that the patient make the phone call to the office.)

#2 You volunteer in an area where you have access to patient census information. While performing your regular duties, you recognize the name of a fellow volunteer or other acquaintance.

**OK to:** Continue with your regular duties, disregarding the information you saw.

**Not OK To:** Assume that since you know the person that it would be ok to share the information.

**Not OK to:** Scan the census for people you may know.

**OK to:** Only use patient census information for the minimum necessary to complete your duties, i.e. responding to a request for a patient room number.

#3 You are having lunch with a group of volunteer friends and someone in the group says “Did you know that Mary is in the hospital?”

**OK to:** Politely stop the conversation and remind your fellow volunteer that sharing protected health information for non TPO purposes is not something we do. A reminder that we all need to be HIPAA compliant would be appropriate.

**Not OK to:** Talk about any person’s health information EVEN when among friends!
Consequences of Non-compliance with Law

It has always been against Mayo policy to improperly share, use or dispose of patient information in the wrong way. Under HIPAA law there are now fines and penalties associated with non-compliance.

Mayo treats patient privacy issues seriously. A breach of privacy may result in termination. Wrongful and willful disclosure of health information carries fines and may involve jail time.

Other good reasons to follow HIPAA law:

- It is the right thing to do!
- It is in keeping with the values of our organization.
- Imagine that it was your personal information or the personal information of a loved one that was being discussed without consent!

ALL PATIENT INFORMATION MUST BE PROTECTED AND REMAIN CONFIDENTIAL!
What is new with Patient Rights?

Under HIPAA, patients have the right to know how their health information may be used or disclosed, and that they have certain privacy rights. These rights, new and revised, are communicated to our patients through a document called Notice of Privacy Practices.

These rights allow patients to:

- Obtain a list of who we have shared their health information with for the past six years.
- Request to amend their medical record.
- Request other communications such as asking to be notified of lab results only at work and not at home.
- Review and copy their medical record.
- Request restrictions on the use and sharing of their information, such as “Opting out” of the hospital directory.

Before HIPAA, it was not uncommon for patient’s private information to be given to other companies for the purpose of marketing products or services. Now, HIPAA states that healthcare providers must get the patient’s signed authorization before doing this.
Providing for the Security of Patient Information

With Computers:

We must ensure that all health information, regardless of where it is, is secure. This includes information stored on computers. HIPAA indicates that we must protect all patient information on computers by:

• Properly signing on with individual IDs and passwords
• Signing off of computers when leaving the desk
• Keeping IDs and passwords confidential
• Protecting computer screens from unwanted viewing.

Proper Disposal of Information:

It is important to handle and dispose of patient information carefully, using a shredder or appropriate container specified by service area instead of simply throwing papers away. The procedure for the proper disposal of health information will be covered in specific service areas. As a general rule of thumb, never dispose of patient information in any area trash bin, when in doubt, ask!

Email and Fax:

HIPAA indicates that we must also protect all patient information that is transmitted electronically. Volunteers that may be subject to these tasks will be trained in their specific service areas.
Reporting Violations
Whose responsibility is it to report violations, or suspected violations?

It is your responsibility, my responsibility, it is EVERYONE’S responsibility!

Whether someone has received patient information improperly or shared information in the wrong way, everyone has a responsibility to report violations or suspected violations. If you are unsure— ask!

Your volunteer coordinator is a great place to start with any question related to HIPAA compliance issues or concerns.

You can also call the Privacy Officer by contacting the Office of Patient Experience at 507-284-4988.
What’s Next?

This training is intended to give you a general overview of HIPAA requirements. If you will have routine access to patient information, you will most likely receive service specific training on how to do your work within HIPAA law.

Remember:

• Always model the correct behavior!
• Always stop and ask yourself if you should be sharing information.
• If the information does not pertain to TPO, don’t discuss it.
• It doesn’t matter who the patient is, fellow volunteer, neighbor, celebrity– you can not share it!
• Dispose of patient information as directed by service area or by placing in appropriate shredding bins, **never in an open wastebasket!**
• Turn computers off if you are leaving the work station.
• Maintain your sign on and password information as confidential.
• REPORT all abuse, enforcing regulations is everyone’s responsibly!
Mayo Clinic Volunteer Programs are an important part of the Mayo Clinic Team!
HIPAA AWARENESS QUIZ

1. PHI stands for:
   P ______________________________________________________
   H ______________________________________________________
   I ______________________________________________________

2. The following information can be used to identify patients, therefore it is protected under HIPAA law:
   □ A) Address
   □ B) License Plate Number
   □ C) Account Number
   □ D) All of the Above

3. Without prior authorization patient information can only be shared if it pertains to:
   T ______________________________________________________
   P ______________________________________________________
   O ______________________________________________________

4. Wrongful disclosure of patient information carries fines and may involve jail time.
   □ True  or  □ False

5. Placing patient information in the wastebasket is okay, as long as it is behind a desk.
   □ True  or  □ False

6. Reporting HIPAA Violations is everyone’s responsibility.
   □ True  or  □ False

7. The phone# for the compliance office is:
   ______________________________________________________
I have completed the HIPAA Privacy Training. I agree to follow Mayo Clinic privacy policy and confidentiality policies.

<table>
<thead>
<tr>
<th>Print Name</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td></td>
</tr>
</tbody>
</table>
Mayo Clinic Volunteer Programs

Mayo Clinic Hospital Methodist Campus Volunteers
Mayo Clinic Hospital Saint Marys Campus Volunteers
Mayo Clinic Volunteer Services
Mayo Clinic Young Volunteers