



Privacy and Security For Shadowers/Observers

This self-directed learning module contains information that Shadowers/Observers are expected to know in order to protect our patients, our guests, and ourselves.

Target Audience: All third parties participating in a job shadowing/observation experience

Instructions

- Read this module and complete the post-test. If you have questions about the material, ask your supervisor.
- If you are completing the post-test manually, please include your signature and the date and give it to your supervisor.

Learning Objectives

When you finish this module, you should be able to:

- **Understand** your role and how you will encounter patient information
- **Understand** how patient information is to be kept private and confidential
- **Know** how to use and disclose patient information
- **Know** how to safeguard patient information
- **Know** how to report a privacy concern



What Is Patient Privacy?

Patient Privacy is a law!

The Health Insurance Portability & Accountability Act, better known as HIPAA, protects patient information and gives patients important rights.



NOTE: ALL CAROLINAS HEALTHCARE SYSTEM TEAMMATES, STUDENTS, VOLUNTEERS, PHYSICIANS, SHADOWERS, ETC. ARE REQUIRED TO PROTECT THE PRIVACY AND SECURITY OF OUR PATIENTS' PROTECTED HEALTH INFORMATION!!

Patient Information Includes:

- Any information that is created or received by Carolinas Healthcare System about an individual
- Information that is related to past, present, or future treatment, billing, or healthcare operations
- Can be electronic, written, or oral

The Elements of Patient Information

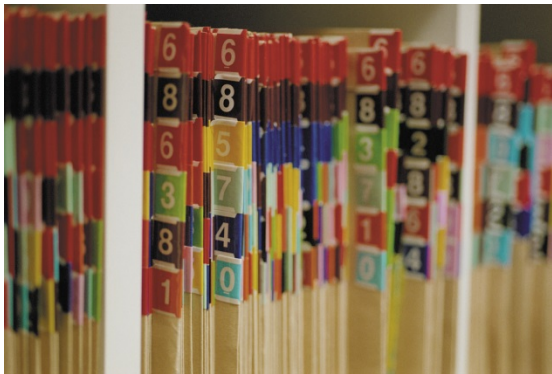
Any of the following information about a patient, their relatives, household members, or employer is confidential:

1. Names
2. Street address, city, county, precinct, and zip code (with exception)
3. All dates (except year) including birth date, admission date, discharge date, date of death; and all ages over 89
4. Telephone numbers
5. Fax numbers
6. Email addresses
7. Social security numbers
8. Medical record numbers
9. Health plan beneficiary numbers
10. Account numbers
11. Certificate/license numbers
12. Vehicle identifiers and serial numbers, including license plate numbers
13. Device identifiers and serial numbers
14. Web Universal Resource Locators (URLs)
15. Internet Protocol (IP) address numbers
16. Biometric identifiers, including finger and voice prints
17. Full face photographic images and any comparable images
18. Any other unique identifying number, characteristic, or code

Patient Information Is Everywhere

It's not just in the paper or electronic records!
Here are some examples of *other* places you
might find patient information:

- Patient status boards
- Financial records
- Test Results
- Computer screens
- Fax sheets
- Data used for research purposes
- Patient identification bracelets
- Prescription bottle labels
- Detailed appointment reminders left on voicemail
- Photograph or video recordings of a patient



Access and Use of Patient Information

Only health care providers can access information for legitimate treatment, payment, or health care operation reasons. Shadowers are not to access any patient information, including any systems that house that information.

DO NOT:

- Access patient information because you are curious regardless of the reason
- Look at patient information as a favor to family and friends
- Use someone else's login and password to access our systems



Protect Patient Privacy 24/7

- You agree not to use, repeat, or reveal any patient information in any form, including in any reports about your experience.
- Your privacy obligation continues after your shadowing experience is over. Keep it confidential!
- Sharing patient or other confidential information with friends or family outside of your shadowing experience is never appropriate and is not allowed.

Disposing Patient Information

Dispose of Patient Information Properly!

Dispose anything that contains patient information in a confidential CHS shred bin. Never put it in a regular trash can.



Be on the lookout!

- Look around for patient information that may be accidentally lying around.
- Pick it up and give it to your supervising provider.



REMEMBER

Do not take any patient information with you when you leave. Check your pockets to make sure you don't have something in there by accident.

Keeping It Down: Incidental Disclosures



Avoid Incidental Disclosures



Reasonable Safeguards

- ✓ Only use and disclose the minimum patient information requested or necessary
- ✓ Avoid conversations about a patient in front of other patients, visitors, families
- ✓ Lower your voice when discussing patient information
- ✓ Avoid conversations about patients in public places (hallways, waiting areas, elevators, cafeteria)

Incidental Disclosures happen when you are properly using and sharing patient information as part of your job, but it is inadvertently overheard or seen by someone who does not have permission to do so. Some of the information you may see will be incidental to your experience, but is still confidential.

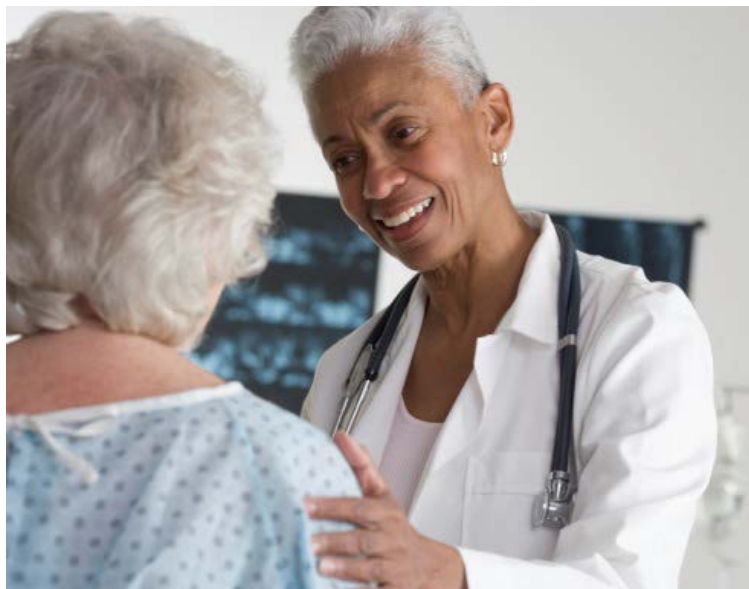
Examples: overhearing discussions with patients in semi-private rooms or seeing information on whiteboards or at nursing stations.

Remember, it's all confidential!



In the Patient Room

- Your sponsoring provider will ask the patient first if it is okay that you are present during the encounter.
 - Wait quietly in the hall until you are invited into the room.
 - If the patient objects to you being present, respect that decision and wait in the area designated by your supervising provider until the encounter is finished.
- Remember to be respectful of the patient
- Wear your CHS badge at all times and be sure it is visible, so the patient has assurances you are allowed to be there.
- Do not provide any care, medical opinions, theories, or diagnosis. This includes not touching the patient.
- Do not represent yourself as a clinical student – it could be confusing to the patient.
- The patient has the right to ask you to leave.



Information Security: Mobile Devices

- You are not allowed to use your mobile device, including your smartphone, to take pictures, make recordings, or text information while you are shadowing.
- Turn off your ringer when you are in a clinical setting.
- Be respectful of patients and staff – do not look at your phone when you are with them. Be present during your shadowing experience.
- Do not text patient information or take any pictures while you are on-site.
- Be mindful of infection control measures.



Social Networking

Remember!

- The internet is a public domain and information posted on social media is not private!
- Communicating patient information is strictly prohibited and your shadowing experience may be immediately terminated.
- You should never post identifying information about patients **OR THEIR IMAGES**, etc. (**Removing a patient's name is not enough to make the patient anonymous**).
- Look at the background! A photograph taken in the hospital or office environment may inadvertently have a patient, computer screens, or whiteboards in the background with patient or internal information visible.

The Pinterest logo, featuring the word "Pinterest" in a white, cursive font on a red rectangular background.The Facebook logo, featuring the word "facebook" in white lowercase letters on a blue background, with a white thumbs-up icon to the right.The Twitter logo, which is the word "twitter" in a light blue, lowercase, sans-serif font.The Flickr logo, consisting of two overlapping circles (one blue, one pink) above the word "flickr" in a blue, lowercase, sans-serif font.

Not A Laughing Matter

A breach of patient information can cause harm to the reputation of Carolinas Healthcare System with our patients and potentially subject us (and you) to serious penalties!

Civil and Federal Enforcements!

- Individuals can be found criminally liable under HIPAA
- Civil and criminal penalties at the State and Federal level
- Penalties of \$100 to \$1.5 million dollars
- Institutions can be fined for failure to act



To report a privacy issue, or if you have a question or concern regarding privacy, you should immediately tell your supervising provider. You will not get in trouble for reporting a potential privacy issue. You can also report it to Corporate Privacy at 704-512-5900

Remember that CHS has other information that is proprietary and confidential, such as business, financial, and strategy information. Do not share or use any CHS information.



A Few Non-Privacy Reminders

Identification

- You must wear a CHS badge at all times during your shadowing experience.
- It must be visible and attached to your jacket or shirt.
- You must return the badge to your supervisor when your shadowing experience ends.

Health Screenings

Make sure you have your health screenings done and documented.

These include screenings or vaccines for flu, TB, and Hepatitis B.



Shadowing Agreement

You must read and sign the Shadowing Agreement. It has important information about privacy, confidentiality, behavior, and other requirements.

Dress Code

You must follow the CHS dress code policy (HR 5.01)

Examples of what you can wear:

- Suits
- Slacks and a shirt
- Dresses and skirts that are no more than 2 inches above the knee
- Closed toed shoes

Examples of what you cannot wear:

- Tank tops, tube tops, see through clothing
- Skirts more than 2 inches above the knee
- Open toed shoes

Shadower Privacy Test

Name: _____

Date: _____

1. You need to throw away papers that contain patient information. What should you do?

- a. Throw the paper in the trash can.
- b. Throw the papers in a locked shred bin or give them to your supervising provider.
- c. Throw the paper away in a regular trash can or dumpster.
- d. Leave the paper on the floor.

2. Which one of the following is an example of how to *avoid* an incidental disclosure of patient information?

- a. Avoiding talking about one patient in front of other patients and family members.
- b. Avoiding talking about patient information in public places (ex: elevators, cafeterias, waiting areas)
- c. Waiting until you and your supervising provider are in a more confidential area before asking questions.
- d. All of the above.

3. You are walking down the hall and see a computer screen with patient information. What should you do?

- a. Look at the information on it so you can learn more about patient care.
- b. Start typing on the computer to see what else you can find.
- c. Look away from the computer and, if no one is around it, let your supervising provider know about it.
- d. Snap a picture of it with your iPhone – this could be a great picture for your school report.

Shadower Privacy Test

Name: _____

Date: _____

4. During your shadowing experience, a well-known celebrity comes in for treatment. True or False: It's okay to post information or pictures about celebrity's appearance at the hospital on your Facebook or Twitter page because your profile is private and only your friends can see it.

- a. True
- b. False

5. You are observing a clinical area and want to see a patient encounter. What is the proper first step?

- a. Walk into the patient room and start giving advice.
- b. Give the supervising provider a chance to ask the patient for permission for you to come in and honor the patient's decision.
- c. Take the chart off the wall while you are waiting and look at it.
- d. Pull out your phone and start taking pictures of the treatment area.

6. If you have a privacy concern, who should you tell?

- a. Your Parent
- b. Your Teacher
- c. Your Supervising Provider
- d. Your Best Friend

7. True or False: Your duties of confidentiality end when your shadowing experience is over.

- a. True
- b. False