

2017 Annual HIPAA Training for HHS Volunteers

Why are we as volunteers expected to participate in annual training?

Anytime volunteers, interns and contractual providers come in contact with consumer or client information (or any personal health information) written, spoken, or electronically transmitted, they become involved with some facet of HIPAA regulations. Your annual HIPAA training participation benefits our clients by ensuring that you are made aware of the law protecting client's health information. It is everyone's responsibility to take the confidentiality of consumer or client information seriously. HIPAA training is required on an annual basis per policy #6280 for Waukesha County Health and Human Services employees, volunteers, interns and contractual providers.

What is HIPAA?

HIPAA stands for Health Insurance Portability and Accountability Act. HIPAA is a law passed by congress in 1996 that sets nations standards for the protection of client or consumer information. HIPAA covers all forms of protected health information, i.e. oral, written and electronic. It is everyone's responsibility to take the confidentiality of consumer client information seriously. Anytime volunteers come in to contact with consumer or client information or any personal information written, spoken of electronically transmitted, they become involved with some facet of HIPAA regulations.

What is Protected Health Information (PHI)

PHI is individually identifiable health information relating to information:

- That reveals the physical or mental state of a person's health
- About the payment for the health care services of an individual
- That identifies with reasonable accuracy and speed the identity of a client/patient

PHI is information that can be Written, Verbal, and Electronic and includes:

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| 1. Name | 8. Medical record numbers |
| 2. Geographic subdivisions smaller than a State <ul style="list-style-type: none">• Street Address• City• County• Precinct• Zip Code/Equivalent Geocodes | 9. Health plan beneficiary numbers |
| 3. Dates, except year <ul style="list-style-type: none">• Birth date• Admission date• Discharge date• Date of death | 10. Account numbers |
| 4. Telephone numbers | 11. Certificate/license numbers |
| 5. Fax number | 12. Vehicle identifiers and serial numbers, including license plate numbers |
| 6. E-Mail Address | 13. Device identifiers and serial numbers |
| 7. Social security numbers | 14. Web universal resource locations (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 |

Minimum Necessary - When protected health information is used or disclosed, only the information that is needed for the immediate use or disclosure should be made available by the health care provider or other covered entity.

"Need to Know":

- Access to PHI only if it is pertinent to your volunteer position
- Ask yourself "Do I need this information to do my volunteer job?"

How and Whom Do You Report a Concern or Violation To?

It is your duty to report any concerns you have about privacy and security

- Tell your supervisor right away
- Supervisor will discuss concern with HIPAA Privacy and Security Coordinator – Sandra Masker
- The County Security Officer is Allen Mundt
- The County Privacy Officer is Tom Farley

What are the consequences for not complying with the law?

Under the HIPAA ruling there are fines and penalties for improperly sharing, using or disposing of consumer client information in the wrong way. A breach of privacy may result in terminations. Wrongful or willful disclosure of health information carries fines and can involve jail time.

Scenarios:

#1. You have a question regarding a client you have been working with and want assistance from the supervisor you report to by sending them an email.

Ok to send the supervisor an email with a client question. Include only the client initials when referring to the client. Volunteers can also encrypt with client information.

Not Ok to include the client's full name or any other identifiable information in a non-encrypted email.

Explanation: A Client's full name is protected information, identifying information including a client's full name should never be in the subject line of any e-mail sent in and outside of the Health and Human Services Building

#2. During the course of your regular duties, you run into another volunteer in the building and he begins talking about a client he is working with.

Ok to politely stop the conversation and remind the volunteer that it is protected information.

Not Ok to talk about any person's health information, without authorization, even amongst fellow volunteers.

Explanation: Although the volunteer probably means well, it is a violation of confidentiality and HIPAA to discuss clients with other volunteers even if they have worked with them. The volunteer should only know the minimum necessary to do his/her job.

#3. You are reviewing the names of the new clients you will be working with and notice the name of your neighbor. Is it ok to share the information with a family member?

Ok to take note of the new client and incorporate him/ her into consideration for the volunteer job you will be doing with him.

Not Ok to go home and tell a family member that your neighbor is using county services.

Explanation: You should not identify any clients and should take care that identifying characteristic and / or facts are not revealed. Remember to protect your neighbor's information.

#4. You run into a client you have worked with while grocery shopping.

Ok to wait for him or her to approach you.

Not Ok to approach him to see how he is doing and see if he needs any support.

Explanation: You need to wait for clients to approach you while in a public setting. The person they are with may not know their friend or family member is receiving services or if they are alone, they may not want others surrounding them to know that they are receiving services.