



# What is PHI?

PHI is any health information that can be tied to an individual, which under HIPAA means protected health information includes one or more of the following 18 identifiers. If these identifiers are removed the information is considered de-identified protected health information, which is not subject to the restrictions of the HIPAA Privacy Rule.

1. Names (Full or last name and initial)
2. All geographical identifiers smaller than a state, except for the initial three digits of a zip code if, according to the current publicly available data from the U.S. Bureau of the Census: the geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and the initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000
3. Dates (other than year) directly related to an individual
4. Phone Numbers
5. Fax numbers
6. Email addresses
7. Social Security numbers
8. Medical record numbers
9. Health insurance beneficiary numbers
10. Account numbers
11. Certificate/license numbers
12. Vehicle identifiers (including serial numbers and license plate numbers)
13. Device identifiers and serial numbers;
14. Web Uniform Resource Locators (URLs)
15. Internet Protocol (IP) address numbers
16. Biometric identifiers, including finger, retinal and voice prints
17. Full face photographic images and any comparable images
18. Any other unique identifying number, characteristic, or code except the unique code assigned by the investigator to code the data

## How Must HIPAA Protected Health Information be Safeguarded?

The HIPAA Security Rule requires covered entities to protect against reasonably anticipated threats to the security of PHI. Covered entities must implement safeguards to ensure the confidentiality, integrity, and availability of PHI, although HIPAA is not technology specific and the exact safeguards that should be implemented are left to the discretion of the covered entity. HIPAA requires physical, technical, and administrative safeguards to be implemented. Technologies such as encryption software and firewalls are covered under technical safeguards. Physical safeguards for PHI data include keeping physical records and electronic devices containing PHI under lock and key. Administrative safeguards include access controls to limit who can view PHI information and security awareness training.



# HIPAA

To ensure that the rights concerning privacy and protection of all patients being treated by the Agency are respected, all patients/guardians will be apprised of their rights related to protection of personal health information. The staff will be educated regarding the legal requirements for education relative to privacy acts.

The Agency will adhere to the federal regulations regarding protection of personal health information. To ensure that at the time of acceptance for care, patients/guardians will be provided with written information that meets the standards defined in the Privacy Rule of the Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996.

The Agency's Notice of Privacy Practices will be available to the patient/guardian and documentation supporting provision and understanding will be retained in the clinical record. Appropriate authorization for the Agency's use of personal health information will be signed and witnessed during the intake process.

The Agency orientation process will include current information regarding the Privacy Rule of the Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996, protection of personal health information and an annual In-service will be provided to all staff.

- \*Patients cared for by SPEECH TACTICS have the following privacy rights:\*
- \* To receive a paper copy of the agency's Notice of Privacy Practices
  - \* To request restrictions on the uses and disclosures of health information
  - \* To request to receive confidential communication
  - \* To access their protected health information for inspection and/or copying
  - \* To amend their health care information
  - \* To request an accounting of disclosures of health information

The privacy policies of SPEECH TACTICS detail the requirements for each of these rights and provide procedures for implementation. Staff at SPEECH TACTICS are provided with annual training regarding patient rights with respect to their health information.