



# Privacy Buzz



APRIL 2017 ISSUE – ELECTRONIC MESSAGING

The Electronic Messaging of Individually Identifiable patient and other Sensitive Information Policy IM 10-30.15 was updated March 2017 and is now published in Policy Tech.

## **Updates:**

- Workforce members who receive audio files or transcriptions of voicemails via e-mails (ie: Lync telephones) should **direct callers in their voicemail prompt that PHI should not be left in voicemail messages.**
- In order to prevent the accidental transfer of ePHI (electronic PHI) or other sensitive data outside of VUMC, **workforce members are prohibited from auto-forwarding emails** from their Vanderbilt email account to an external or personal email account.
- Electronic messages including email, text messaging, and instant messaging (i.e., Lync) containing direct identifiers with information about that individual must reflect the ‘minimum necessary’ standard.

## **Recommended safeguards are:**

- Use the medical record number (MRN) as primary identifier for a patient or the MRN with only part of the patient’s name (initial of first name with last name, first name with initial of last name, or use of only initials );
- Never combine full name with date of birth and include clinical information; such as the reason for a clinical visit, diagnosis, surgical procedure, or test results;
- Use of a Vanderbilt employee ID number or student number as the primary identifier along with the individual’s name for employee or student identification.

## **You Should Know:**

- Use of the full nine-digit social security number in electronic messaging is prohibited unless the message or the attached file containing the information is encrypted.
- Use the **MyHealthatVanderbilt** patient portal for secure messaging between patients and clinical providers’ offices. Patients should be cautioned about the risks and provide consent before communication of personal information over the Internet.
- Use the **File Transfer Application (FTA)** web based version, or **Accellion** Outlook plugin to transfer a file (excel, Word, PD, etc) from one email user to another. This secure application can be used to transfer files among Vanderbilt workforce members and between Vanderbilt workforce members and external party users. Secure File Transfer is required for transmitting all data that contain PHI, RHI or sensitive information.
- The **StarPanel** message basket system is the preferred mode of electronic messaging among and between VUMC clinical staff and faculty about a specific patient. **As an employee you should message about your own care through the MHAV patient portal and not using your StarPanel message basket or your Vanderbilt email.**
- Forwarding emails containing Protected Health Information (PHI) that have been sent in an unsecure manner may result in a violation of the Electronic Messaging Policy, and may be subject to disciplinary action as defined in VUMC policy, Sanctions for Privacy and Information Security Violations.

IM 10-30.15 [“Electronic Messaging of Individually Identifiable Patient and Other Sensitive Information”](#)

IM 10-30.12 [“Sanctions for Privacy and Information Security Violations”](#)

**Website for File Transfer Application:** <http://www.mc.vanderbilt.edu/root/vumc.php?site=InfoPrivacySecurity&doc=30530>

For more information go to: [www.mc.vanderbilt.edu/privacy](http://www.mc.vanderbilt.edu/privacy) or e-mail the Privacy Office at [privacy.office@vanderbilt.edu](mailto:privacy.office@vanderbilt.edu)