



HIPAA Social Media Rules

- Prohibit disclosure of PHI without individual's authorization
- What is considered PHI?
 - Diagnosis
 - Treatment information
 - Prescription information
 - If these maintained in “designated record set” with identifiers such as DOB, gender, etc. all information in set considered PHI
 - ONLY relates to health information about patients, health plan members
 - DOES NOT relate to educational & employment records



What Are PHI Identifiers?

- Any note, image, or file maintained in a record set that could be used to identify an individual
- Other identifiers to know about
 - e.g., If image of emotional support animal could be used to identify subject of the health information, animal is an identifier
 - Another example-if pediatrician is sent photo of child & identity can be determined from the photo, parent must authorize display on a baby wall



How to Safeguard PHI

- Must protect against reasonably expected threats
 - Must conduct frequent risk analyses to identify threats
- Must implement physical, technical, administrative safeguards
- Safeguards include:
 - Technical-encryption software, firewalls
 - Physical-keeping records, devices w/PHI under lock & key
 - Administrative-access controls to limit who can view PHI
- Required staff education regarding HIPAA security awareness
 - Must include both Privacy & Security Rules (new & current associates)