



Compliance Compass

from the desk of Corporate Compliance

Restricted Access

HIPAA violations can occur anytime, and even curiosity, caring, or concern are not permitted to access PHI.

Imagine this scenario: you work in the patient tower. You've just come on shift and are wondering what your workload will look like. You take a moment to scan through the ED Board, check for patients that may be potential transfers to your floor, and read patient summaries to see if they fit your department criteria. This could be a HIPAA violation if not necessary to do your job!

Remember these HIPAA guidelines that must be followed at all times:

- Accessing any PHI (Protected Health Information) must comply with a "Treatment, Payment, or Operations" related purpose. Potentially being part of a patient care team is not "treatment." Only once the patient has been assigned to your floor—and to you in particular—are you part of the care team with a need to access that patient record.
- Access only the "minimum necessary" to accomplish your task. You likely will not need to review the patient's entire medical history in order to provide or document care. Anything outside of the Minimum Necessary Rule is a HIPAA and privacy violation.
- Remember that EPIC tracks all access, including each and every click made in the system.

Do NOT:

- Access PHI of a family member, friend, or co-worker
- Access PHI not necessary to do your work
- Access PHI outside of department/TPO purposes

Spectrum Health has a zero-tolerance policy for intentional inappropriate access. Such access can result in corrective action, up to and including termination.

If you are unsure about a particular case, ask your manager or contact the Privacy Team at SHL_Privacy@lakelandhealth.org or 269.985.4501



Anonymous hotline:
800.325.6115

Anonymous web portal:
spectrumhealthlakeland.org/ethics



Chris Kuhlmann MBA, CHC, CHPC
Compliance & Privacy Officer
P: 269.985.4600 | C: 870.557.0080
ckuhlmann@lakelandhealth.org

 **Spectrum Health**
Lakeland