

KAISER PERMANENTE HIPAA PRIVACY AND SECURITY TRAINING FOR REGISTRY PERSONNEL

Purpose:

The Health Insurance Portability and Accountability Act (HIPAA) requires health care professionals to obtain and complete training on both the federal HIPAA law and a health care organization's specific HIPAA policies and procedures. The purpose of this training document is to provide you with a basic understanding of HIPAA and Kaiser Permanente (KP) requirements for protecting the privacy and security of KP Member/Patient Identifiable Information (MPII) and Protected Health Information (PHI). Although you may have obtained HIPAA privacy and security training from another healthcare organization, you are responsible for reading and understanding this information about KP's privacy and security requirements and obtaining any additional information you need to comply with all laws and policies that affect the use and disclosure of MPII or PHI when you provide or coordinate health care services for a KP member or patient. If you have questions about what you must do or need additional information, consult with your supervisor, contract manager, your local Compliance Officer or your Regional Privacy and Security Officer. You can also access information at kp.org/compliance.

If you are aware of compliance, privacy or security issues or have concerns about a suspected violation of the law, you should notify your KP supervisor or call the KP Compliance Hotline: 1-888-774-9100.

Definitions:

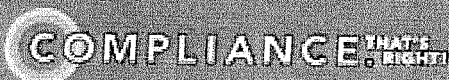
HIPAA - (Health Insurance Portability and Accountability Act) requires all KP workforce members, regardless of job title or hours worked, to understand the risks and safeguard the privacy and security of individually identifiable information of KP members and patients.

MPII - (member patient identifiable information) is a term defined in KP policy and is any member/patient individually identifiable information that KP has received, collected, created, transmitted or maintained in connection with the individual's status as a KP member or patient. MPII includes financial data, credit card account numbers and PINs, and protected health information (PHI), but not health information in employment files. KP policy requires all KP workforce members, including contractors and vendors who work at a KP facility and act as workforce members, to protect the security of MPII in much the same way as HIPAA requires workforce members to protect PHI (see definition below).

PHI - (protected health information) is a term defined by HIPAA that covers an individual's past, present and future health care and health care payment information and includes one or more of 18 personal identifiers that individually identify a person—such as name, medical record number, address, e-mail address, telephone number, vehicle ID number, social security number, driver's license number, etc. The law and policy require you to protect all forms of PHI—written, spoken or electronic. For example, the law prohibits your accessing or discussing a member/patient's medical diagnosis unless it is required for your job and allowed by the law. PHI is a subset of MPII.

Individual Identifiers – any one or more of the following member/patient individual identifiers must be protected when used by KP: name, street or email addresses, birth date, deceased date, admission and discharge dates, telephone and fax numbers, Social Security Number, medical record or health record number, credit and banking account numbers, certificate/license number, driver's license and other vehicle identifiers, medical device numbers, URLs, biometric identifiers, full face photograph, any other unique identifying number or characteristic.

Workforce Members – according to HIPAA and KP policy, KP workforce members include all employees, volunteers, trainees or other persons who work for KP and who perform services on KP premises and are otherwise under the supervision or control of KP. For example, an individual who is a registry employee working at a KP medical center or clinic is a workforce member.



Compliance Hotline 1-888-774-9100 • Compliance Online kp.org/compliance



