

UConn HEALTH

POLICY NUMBER 2014-09

April 14, 2015

POLICY: HANDLING PAPER COMMUNICATIONS ABOUT PATIENTS INCLUDING PROTECTED HEALTH INFORMATION (PHI) – ASSURING PROPER IDENTITY OF THE PATIENT

PURPOSE:

UConn Health is committed to the privacy of our patients. In order to assure patient information in paper form is handled properly and disclosed only to those who have a need to know, UConn Health has adopted the policy below.

SCOPE:

Applies to all UConn Health workforce noted below:

- Employees (including faculty and staff)
- Volunteers
- Students and residents
- Temporary staff
- Agency and contracted staff
- Credentialed staff

This policy **excludes** inmate patients. Inmate patients do not receive any printed information directly. UConn Health should send any inmate patient information in a sealed envelope to the appropriate Department of Correction facility, rather than providing it to the inmate directly.

POLICY STATEMENT:

Whenever paper documents including PHI are provided directly to or mailed to a patient, the patient's family/legally authorized representative, or another provider of care, two forms of patient identification will be used to verify the patient's identity with the intended paper. Examples of patient identifiers include the patient's name, date of birth or medical record number (TO number).

1. Mailing documents:

When preparing the mailing of any patient information, the patient's proper identity must be verified for all pages to be included in the mailing. The following steps will be taken to assure this:

- a. Use two data points of patient identification to assure the mailing is for the correct patient.
- b. Assure that the intended recipient is authorized to receive the information being sent e.g. consider minors, legally authorized representatives, appropriate patient care providers.
- c. Double check the patient name on each page to be mailed to assure it is intended for the proper patient.
- d. The individual preparing the mailing will initial each page with his/her initials.
- e. Assure the mailing address is the correct address for the intended recipient of the patient's PHI.
- f. Whenever possible, utilize an envelope with a window to avoid addressing the envelope incorrectly. Make sure no PHI is visible in the window.

2. Handing paper documents to individuals:

When preparing paper documents for handing over to a patient, family member, caregiver, or care provider the patient's proper identity must first be verified for all pages provided. Departments are required to develop procedures to ensure that the intended recipient receives the intended content only.

The following parameters must be addressed:

- a. Assure that the intended recipient of the documents is authorized to receive the information being handed over e.g. consider minors, legally authorized representatives, appropriate providers.
- b. Verify the identity of the intended recipient associated with the patient.
- c. Double check the patient name on each page to assure that what is provided is about the proper patient
- d. The individual providing the documents will initial each page with his/her initials.
- e. Two forms of identification should be used whenever the patient identity has not been otherwise verified by the individual handling paper documents to the patient/patient representative.

Iris Mauriello (Signed)

4/23/15

Iris Mauriello
Compliance Integrity/Privacy Officer

Date

Andrew Agwunobi (Signed)

4/29/15

Andrew Agwunobi, M.D., MBA
Interim Executive Vice President for Health Affairs

Date

New Policy: 11/18/14

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