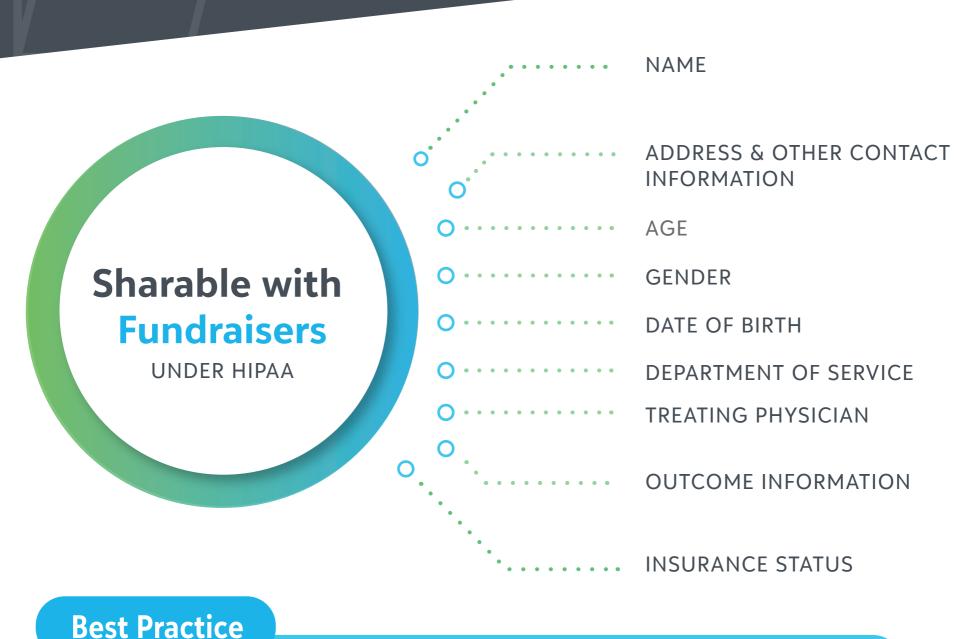
Being a Good Steward of Patient Data

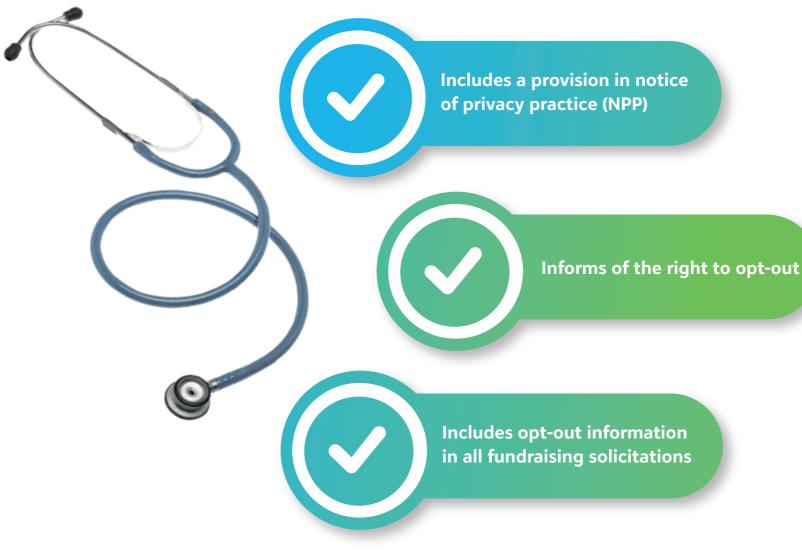
By Marti Arvin, Executive Advisor CynergisTek, Inc.

> Being a good steward of protected health information (PHI) means understanding the laws and policies, collecting only the information needed, and using it only for the purposes for which it was collected.



Some parts of the law need to be interpreted by the covered entity and a guiding policy implemented.

You Can Share PHI for Fundraising if the Covered Entity...



PHI can be used internally, disclosed to an institutionally related foundation, or shared with

a business associate if a Business Associate Agreement (BAA) is in place.

Individually Identifiable Health It is Not PHI if:

Is it Always Considered PHI?

It is held by the covered entity

Information (IIHI) is PHI if:

- component of a hybrid entity

It is held by the covered

Shared with a business

efforts

associate supporting the

covered entity's fundraising

- **Using the Data**

The information is in the possession

foundation

The foundation receives IIHI from a donor and subsequently shares it with a vendor supporting

fundraising efforts

of an institutionally related

between increasing funding for mission critical functions with the

Work to achieve a balance

Follow your organization's

governance policies.

You Have a

Responsibility to...

Ask for the minimum information

to accomplish your intended goal.

goal of protecting patient privacy.

established security and data

Securing the Data

Determine the information that can be legally shared, and also what

state, and federal laws.

Work with the

Compliance Officer to...

Discuss the data needed and

for what purpose to determine

compliance with organizational,

the organization should share.

• Take a "big picture" approach to

data requests to simplify compliance and processes.

You Have a Work with the

Responsibility to...

- Follow your organization's policies designed to limit risk to system
- security. Work as a liaison between your technology providers and the internal information security

team.

controls of the locations where data is stored.

Dig deeper into HIPAA and

fundraising, including the

regulations, roles and compliance.

• Be familiar with the fundraising

system capabilities and the security

Compliance Officer to...

Protect PHI through encryption,

multi-factor authentication (if available), and follow acceptable use policies. • Use automation to set very specific parameters around the data that

is shared by the covered entity

Follow good data governance

practices.

with the fundraising organization.

Learn more

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