

**UNIVERSITY OF KANSAS  
WATKINS HEALTH SERVICES  
ADMINISTRATION**

NUMBER: <b>AD-321</b>	ISSUE DATE: <b>2/2001</b>
TITLE: <b>Incidental Disclosures of Protected Health Information</b>	REVISED: <b>8/1/2016</b>
TITLE OF OWNER: <b>Director</b>	APPROVED: <b>Director</b>

**PURPOSE:**

To describe the reasonable safeguards that Watkins Health Services (WHS) utilizes to protect patient privacy.

**POLICY:**

WHS will implement reasonable safeguards to minimize incidental uses and disclosure of protected health information (PHI) that occur as a by-product of providing care and services to the patient.

**PROCEDURES**

1. All staff should minimize the use of the patient's full name in public areas.
2. PHI will not be discussed in areas where it can be overheard by another patient or visitor.
3. Access to patient information will be limited to the minimum necessary to accomplish the intended purpose. Refer to other Administrative policies for handling of PHI.
4. No photograph will be taken of a patient without written permission. Refer to AD-407 Patient Consent for Photography.
5. No listing of patient names will be posted for any reason in any location.
6. All treatment in examination rooms will be conducted behind closed doors.
7. The Pharmacy has counseling booths that are used when dispensing new prescriptions or when the patient has questions. If a patient requests a more private setting for discussing medication needs, Room 1100D in the Pharmacy will be used.
8. In the Treatment Clinic, one of the "bays" will typically be used for patient care. The curtain should be drawn for privacy. However, one of the private exam rooms may be used in the following scenarios:
  - When the clinician believes more privacy is required
  - When extended care is required
  - The patient requests a more private setting regardless of the reason for the visit.
9. In the Laboratory, typically only one patient at a time will be seated in the "blood-

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draw” room. However, if there is a significant backlog of patients to be served, it may be necessary for two patients to be present in the blood-draw room.

- Both patients will be asked if they are comfortable with this and must concur.
- A portable screen will be placed between the two reclining chairs.

If the Laboratory staff believe a more private setting is required for collecting patient information on sensitive matters, or if the patient requests same, the staff may use their discretion in how to accommodate this need.

10. In non-patient care areas, when a patient is being helped and other patients are waiting for assistance, those waiting are to be asked to stand or sit at a distance from the counter to facilitate a private discussion. Also, these discussions are to be held at a reduced volume level with the intention that only the patient and employee may hear. If the patient requests a more private setting for the discussion, the supervisor’s office should be made available.
11. In any other area within WHS, if a patient requests a more private setting for a clinical discussion regardless of the reason, every attempt must be made to accommodate the request, including use of supervisors’ offices, a conference room, an exam room, etc.
12. Written and electronic patient information will be appropriately secured in accordance with other Administrative policies and will only be accessed by those with a job-related, need-to-know.
13. Paging of patient names over the public-address system will be limited solely to those times the patient is needed in a patient care area or in those rare cases a caller (e.g. a parent) requests the patient to be paged. When paging, only the LAST name is to be used and in a gender-neutral fashion, such as, “Patient Smith, please return to Radiology,” Or, “Patient Johnson...Please go to the Laboratory.”

**REFERENCES:**

AD-407 Patient Consent for Photography

**This document is on file with the KU Policy Library.**