

# Chicago Dermatological Society

## Patient Privacy and HIPAA Compliance

APPROVED  
June 3, 2015

### Purpose

The purpose of this policy is to reaffirm the intent of the Chicago Dermatological Society (CDS) to appropriately safeguard patient privacy with respect to CDS conferences, publications and its website, and also to adhere to HIPAA requirements. All CDS members are expected to be aware of and conform to all regulations concerning patient privacy when attending a conference or utilizing any materials produced by CDS which contains any form of patient information which could be considered to be Protected Health Information.

### Background

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its implementing regulations restrict health care providers and others to use and disclose protected health information (PHI). Protected health information means information that is created or received by an entity and relates to the past, present, or future physical or mental health condition of a patient; the provision of health care to a patient; or the past, present, or future payment for the provision of health care to a patient; and that identifies the patient or for which there is a reasonable basis to believe the information can be used to identify the patient. Protected health information includes information of persons living or deceased.

Some examples of PHI are:

- Patient's medical record number
- Patient's demographic information (e.g. address, telephone number)
- Information doctors, nurses and other health care providers put in a patient's medical record
- Identifiable images of the patient
- Conversations a provider has about a patient's care or treatment with nurses and others
- Information about a patient in a provider's computer system or a health insurer's computer system
- Billing information about a patient at a clinic
- Any health information that can lead to the identity of an individual or the contents of the information can be used to make a reasonable assumption as to the identity of the individual

### Policy

The CDS takes seriously compliance with HIPAA regulations and safeguards concerning protected health information. Accordingly, the Chicago Dermatological Society has adopted the following provisions:

1. Case descriptions included in clinical conference "protocol books" and posters may not include information that could potentially identify a particular patient.
2. Photos of patients will not be published in clinical conference handout materials, including the protocol book.
3. To the extent possible, posters, slide presentations and videos displayed at CDS clinical conferences should avoid using photos that display a patient's full face or other features that could identify a particular patient. When a full-face photo must be used for clinical/educational reasons, the photo must be altered as much as possible to disguise the identity of the patient.
4. At all times, all attendees of CDS clinical conferences must adhere to appropriate behavior that respects the patient's right to privacy. Taking personal photos of posters or other displays, images included in general session lectures/presentations, and live patients at CDS conferences is strictly prohibited. Making audio recordings of any session at a CDS conference also is prohibited.
5. Attendees may not share materials distributed by CDS as part of the clinical conference or on its website with others who are not participating in the conference or who are not members of the CDS.
6. It is the responsibility of the "host" department partnering with CDS for a clinical conference to obtain all appropriate patient waivers and/or informed consent regarding the patient's participation in the CDS conference, including presentation of their case and display of posters or photos.
7. CDS will include a copy of its patient privacy policy in every meeting packet, and it will display a poster reiterating this policy at the entrance to live patient and poster viewing areas.