“Preventing Unintentional and Accidental Disclosures”

Vanderbilt University Medical Center (VUMC) is committed to supporting and protecting patients’ rights with regard to their health information. Patients expect their personal health information to be accurate, secure, and confidential.

**KEY POINTS:**

1. **ALWAYS** ask the patient to confirm their own identifiers (name, DOB and address) when registering a patient in your department. **NEVER** tell the patient the identifiers let them tell you the information.

2. Take precautions to protect sensitive information that might be overheard:
   - Avoid conversations about one patient in front of other patients
   - Lower voices when discussing patient information in person and/or over the phone

3. If other patients are pushing forward towards the registration counter when you are checking another patient in/out politely ask them to step back or have a seat until they are called, so the information cannot be overheard.

4. When patient demographic information does not match the information that the patient has provided take a next step to ask for identification. **DO NOT** change the registration information to match the information given to you by the patient.
   - Ex: Patient says name is Mary J Smith, DOB 3/11/1985 and you pull up Mary Smith, DOB 3/11/1985, if they do not match, do not change Mary Smith’s information. (There are several instances when patients have the same first and last name and DOB)
   - Ask the patient for more information such as address or last 4 of Social Security.
   - If there are no identifiers that match create a new medical record number. (It is easier to merge the record than move the information from the incorrect record).

5. Protected Health Information (PHI) information should NOT be shared or viewable in public areas

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**Scenario:** A patient checks in at the desk of a clinic. The patient service representative (PSR) asks the patient to verify their name and date of birth. The patient gives their name and date of birth. The PSR states “we must have your date of birth documented incorrectly,” The PSR asks for the patient’s address, and the addresses do not match. The PSR checks the patient in after updating in the record the date of birth and address.

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**Issue:** The patient has the same name as another patient. Because the PSR has changed another patient’s information, PHI is documented in the incorrect medical record.

**Correction:** The PSR should not have changed the information in the record. They could assign the patient a new medical record number or request more patient identifiers (e.g. last four of patient social security number, copy of identification) to ensure the registration in the correct patient record.

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**Scenario:** A patient is at the checkout counter at a clinic waiting to schedule a follow up appointment with the PSR. While waiting, a second patient comes up to the counter needing to check in for their appointment. Once the first patient’s records are pulled up, the PSR begins discussing (loudly) the details (PHI) of the patient’s next appointment in front of the second patient.

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**Issue:** Inadvertently, the PSR disclosed personal information in front of an uninvolved party. By doing so, the PSR demonstrated a lack of sensitivity to patient privacy.

**Correction:** While these situations may be difficult to avoid, the PSR has a few options in this scenario. If it is not necessary to speak specifically about the appointment, the PSR should simply make sure to avoid the details of the patient’s information and simply complete the order of business. If possible, the PSR could have waited until the second patient was finished checking in. At the very least, the PSR should have lowered their voice in an effort to be discrete.