

## A Typical Scenario

- ◆ A skilled and experienced Medical Dosimetrist performs a complex time-critical treatment plan.
- ◆ Something doesn't look right.
- ◆ The Dosimetrist consults the Simple Country Physicist.
- ◆ The Physicist triages the problem and suspects there is a software problem - Physicist calls Vendor's Tech Support.

## A Typical Scenario (cont.)

- ◆ Tech Support says "We've never seen that before. FTP us the files and we'll have a look."
- ◆ Physicist follows the arcane instructions from Tech Support to bundle up data from application and patient.
- ◆ With finger poised over "return" key, Physicist dimly recalls HIPAA review that Hospital's HR folks made him sit through at orientation.

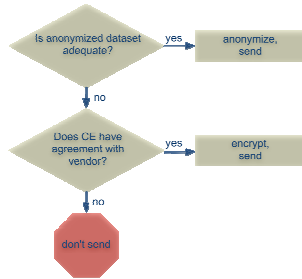
## A Typical Scenario (cont.)

- ◆ Physicist calls Privacy Officer.
- ◆ Privacy Officer says, "No."
- ◆ Physicist says, "But, but..."
- ◆ Privacy Officer says, "No."
- ◆ Physicist says, "Patient on table..."
- ◆ Privacy Officer says, "No."
- ◆ Physicist says, "Mission critical..."
- ◆ Privacy Officer says, "No."

## A Possible Alternative

- ◆ Before any problems arise Physicist, IT Management and Privacy Officer meet to develop a strategy for communicating PHI to vendors in a compliant fashion.
- ◆ When a problem arises, Physicist executes the plan.

## Sending PHI to Vendor: Decision Tree



## Partial HIPAA Compliance Toolkit

- ♦ Have mechanism in place to anonymize data.
- ♦ Have mechanism in place to encrypt data for transmission.
- ♦ Have signed agreements in place with vendors