

## Tools for Exchanging and/or Storing Protected Health Information (PHI)

March 26, 2020

This reference is intended to facilitate the use of permitted and approved tools for exchanging and/or storing the PHI of patients and research subjects in accordance with HIPAA. These tools are expected to be used with computers and devices issued or managed by UW Health or UW-Madison.

Neither UW Health nor UW-Madison approves the use of these tools to facilitate working with PHI on personally-owned and unmanaged computers or devices.

### Permitted / Approved

#### 1. Phone Calls using landlines or VoIP Phone Services provided by UW Health or UW-Madison

#### 2. UW Health Tools

- a. Health Link
- b. Health Link InBasket Messaging
- c. Epic Haiku (iOS or Android) and Epic Canto (for iPads)
- d. Epic Secure Chat
- e. MyChart (Ambulatory)
- f. MyChart Bedside (Inpatient)
- g. Webex Videoconferencing
- h. SharePoint
- i. UW Health Telemedicine Platforms, including Vidyo
- j. UW Health Website Forms

#### 3. UW-Madison Tools

- a. Secure Box Folders  
*\*\*Secure Box Folders may be requested using the process at [go.wisc.edu/hipaasecurity](https://go.wisc.edu/hipaasecurity)*
- b. SharePoint
- c. Qualtrics
- d. Webex Videoconferencing
- e. Sponsor-provided Databases or Portals

### Permitted / Use with Caution

#### 1. Microsoft Office 365 Email

- \*\* Use ONLY work-issued email address (generally ending in uwhealth.org or wisc.edu)*
- \*\* Use limited or less risky identifiers (i.e., MRN and DOB or initials instead of full names)*
- \*\* Use message encryption if emailing externally*
- \*\* Do not place name, MRN, research subject ID in subject line*
- \*\* Use caution when attaching documents*
- \*\* Consider approved file-sharing/collaboration tools to exchange documents instead of email*
- \*\* In the research context, follow IRB Email Guidance: <https://kb.wisc.edu/hsirbs/71745>*
- \*\* Patients should be encouraged to interact with healthcare providers through patient portals*
- \*\* If patients email healthcare providers directly, they must be advised of risks of emailing PHI*

## 2. eFax Services

**\*\* Verify fax number**

**\*\* Use Cover Sheet**

**\*\* Use institutionally-provided eFax vendor and institutionally-provided fax equipment**

## 3. Institutional Shared Network Drives

**\*\* Should not be used to store duplicative or “shadow” copies of Health Link or EDW data**

## 4. UW Health Tools

a. Cisco Jabber IM (Internal)

b. Text platforms which use automated protocols for one-directional communication

**\*\* Patients or family members must opt in**

**\*\* Patients or family members must not be able to respond**

**\*\* Must be approved by UW Health Privacy Officer on a case-by-case basis**

## 5. UW-Madison Tools

a. Microsoft Teams Messaging (Internal)

b. Webex Teams Messaging (Internal)

## **Not Permitted / Do Not Use**

*If you are aware any of the following tools are or have been used to exchange or store PHI, please submit a HIPAA Incident report as soon as possible to [UW Health](#) or to [UW-Madison](#).*

### 1. **Personal Email Accounts**

2. **Personal File-sharing Accounts** (DropBox, GoogleDrive, OneNote)

3. **Personal Instant Messaging Accounts**

4. **Microsoft Office 365 – Calendar Entries with PHI**

5. **Amazon Web Service (AWS)**

6. **Canvas** (UW-Madison Learning Management System)

7. **Google Cloud Platform**

8. **Google Suite Tools** (Gmail, Drive, Docs, Sheets, Slides, Forms, Calendar, Google+, Hangouts)

9. **Social Media** (Facebook, Twitter, Instagram, Snapchat)

**\*\*In some situations, an IRB may approve a research protocol involving the use of social media;**

**if so, social media may only be used as stated in the approved protocol**

10. **Text Paging**

11. **Texting**

**\*\*In some situations, an IRB may approve a research protocol involving the use of texting; if so,**

**texting may only occur as stated in the approved protocol**

12. **Virtual Assistants** (Alexa, Echo Dot, Siri, Bixby, Alice)

13. **VoIP Phone Services not provided by UW Health or UW-Madison** (Google Voice, WhatsApp)

14. **Zoom**

15. **Other Apps, Software, Tools from Cloud Service Providers unless reviewed and approved by UW Health or UW-Madison, as appropriate**

**[See Following Page for References]**

## References

- 1. UW Health Policies**
  - a. Policy 6.31, E-Mail Transmission of PHI
  - b. Policy 6.32, Provider-Patient Email
  
- 2. UW-Madison Policies**
  - a. HIPAA Policy 8.5, [Security of Faxed, Printed and Copied Documents Containing PHI](#)
  - b. HIPAA Policy 8.6, [E-mail Communications Involving PHI](#)
  - c. Provisional UW–Madison Policy, [Online Collaboration Session Recording Policy](#)
  
- 3. UW-Madison Guidance**
  - a. [Health Sciences IRB, Use of Email for Research Purposes](#)
  - b. [Safe Computing When Traveling Abroad](#)
  
- 4. United States Dept of Health & Human Services Office for Civil Rights Guidance**
  - a. [Guidance on HIPAA and Cloud Computing](#)