

VNS HEALTH CORPORATE POLICY & PROCEDURE

TITLE: Transmission of Protected Health Information (PHI) via E-mail

APPLIES TO: VNS Health Home Care, including the Home Care, and Care Management Organization (CMO) divisions;
VNS Health Personal Care;
VNS Health Behavioral Health, Inc.;
VNS Health Health Plans;
VNS Health Hospice Care; and
Medical Care at Home, P.C. (collectively, “VNS Health”)

POLICY OWNER: Corporate Compliance Department

FIRST ISSUED: March 2022

NUMBER: HIPAA.20

PURPOSE

This policy and procedure governs the transmission of PHI via e-mail.

POLICY

- A. PHI may only be transmitted via e-mail after reasonable safeguards have been taken with respect to the e-mailing of PHI as described below.
- B. If a patient requests that their PHI be provided via less secure means, such as unencrypted e-mail, VNS Health may do so if the patient is appropriately advised of the potential risk to the security and confidentiality of the ePHI.

PROCEDURE

- A. VNS Health employees may send and receive PHI via e-mail only if VNS Health has in place appropriate administrative, technical and physical safeguards to protect such PHI. When sending e-mails containing PHI, VNS Health employees must comply with the requirements of the HIPAA Security Rule and VNS Health’s Security Policies.
- B. Additionally, VNS Health employees must:
 - i. Check e-mail addresses for accuracy before sending an e-mail containing PHI, or send an e-mail alert to the e-mail address for address confirmation prior to sending the e-mail;
 - ii. Ensure that an e-mail containing PHI is encrypted prior to sending;
 - iii. Limit the PHI contained in an e-mail to the minimum necessary to accomplish the purpose or disclosure;

- iv. Whenever possible, avoid transmitting highly sensitive PHI (*e.g.*, mental health information, substance abuse information, HIV status) via e-mail;
- v. Send e-mails containing PHI only from your VNS Health or VNS Health approved e-mail account, and never send e-mails containing PHI to a personal e-mail account; and
- vi. Never use automatic forwarding with your VNS Health or VNS Health approved e-mail account.

REFERENCES:

45 CFR § 164.530(c)

Reviewed:	3/2022	6/2023						
Revised & Approved:	6/2022	9/2023						