

# CAROLINA HEALTH CENTERS, INC.

## POLICY AND PROCEDURE

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**TITLE: TELEHEALTH PRIVACY AND SECURITY**

**CATEGORY: TELEHEALTH**

**NUMBER:**

**EFFECTIVE DATE: APRIL 16, 2020**

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### **POLICY:**

CHC will provide our patients with the option of telehealth visits when appropriate. These visits will be conducted over an interactive platform, providing both audio and video (when at all possible). Patient privacy and security of CHC telehealth visits will be held to at least the same standard as in-office visits. CHC will strive to exceed standards for privacy and security for telehealth visits.

### **SCOPE:**

This policy and the following procedures apply to all patients and staff engaged in telehealth services through CHC.

### **PROCEDURES:**

1. Consent
  - a. Any patient engaging in telehealth services at CHC will be required to give informed consent prior to proceeding with a telehealth visit
  - b. The informed consent will contain at least the following:
    - i. Expectations and limitations of a telehealth visit
    - ii. The possibility of fees associated with the visit (co-payments, co-insurance, or sliding fee charges)
    - iii. Inappropriate use of telehealth services for emergencies
    - iv. The notification of any additional personnel present during the visit
  - c. Consent will be electronic or paper format primarily, but verbal consent will be accepted if the other two forms are unavailable
2. Security architecture
  - a. Telehealth platform is HIPAA compliant, encrypting all content using AES-256 bit encryption from end to end
  - b. Telehealth services are integrated into the EHR for proper audit controls, and every participant is identified and required to verify their identity via system login
3. Identification
  - a. Patient scheduled for the telehealth visit will be required to be present for the visit

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- b. Patient will asked to be identified by name and date of birth
  - c. If care-giver or parent is the primary speaker, then they must give the name and date of birth of the patient scheduled
  - d. Only one patient will be evaluated with a telehealth visit
4. Privacy
- a. Staff members and providers will all connect with the patient in a private and secure fashion
    - i. When connecting by telephone, handset or headset will be used, no speakerphone use will be allowed
    - ii. If connecting by interactive video, staff member or provider will be in a private location, where neither the patient's video nor audio will be seen or heard by other individuals
    - iii. The background images or audio seen or heard by the patient during a telehealth visit will not contain any other patient information
    - iv. All HIPAA standards CHC currently employs with in-office visits apply to telehealth visits
5. Provider identification
- a. Patient will receive notification before the visit of exactly which provider they will be seeing
  - b. Staff will notify patient before the visit of the identity of the provider
  - c. Provider will introduce himself/herself at the beginning of each telehealth visit and as a healthcare provider of CHC
  - d. Patient will receive an After Visit Summary that contains the name, address and phone number of the provider with which they had the telehealth visit
6. No advertising, no marketing
- a. Patients will see no third-party advertising during any telehealth activities with CHC
  - b. CHC will use no patient information through telehealth services for marketing to that patient

Policy creation date April 14, 2020