PURPOSE

The purpose is to establish the policy and procedure for the Department of Community Health (MDHHS) to appropriately guard against the unauthorized modification of Electronic Protected Health Information (ePHI) that is being transmitted over an electronic communications network or via any form of removable media.

DEFINITIONS

ePHI is the acronym for Electronic Protected Health Information. It is Protected Health Information that is transmitted or maintained in electronic form.

PHI is the acronym for Protected Health Information. It is information that can identify a person and contains health related data pertaining to that person.

Workforce Member means employees, volunteers and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, students, volunteers and staff from third party entities who provide service to the covered entity.

POLICY

It is the policy of MDHHS when transmitting ePHI over an electronic network outside of MDHHS's domain that the transmission must utilize an encryption mechanism between the sending and receiving entities or the file, document or folder containing ePHI must be encrypted before the transmission. The types of transmission can include, but are not limited to, FTP and email.

MDHHS recognizes that encryption is not sufficient to guarantee data integrity. However, encrypting and decrypting and its reliance on an unpublished key system adequately minimize the risk of data being tampered while in transit.

PROCEDURE

Workforce Member

When transmitting ePHI via removable media, including but not limited to, floppy disks, CD ROM, memory cards, magnetic tape

and removable hard drives, the file, document or folder containing ePHI must be encrypted.

REFERENCES

45 CFR 164.308(a)(1)

CONTACT

For additional information concerning this policy and procedure, contact the MDHHS Security Officer at MDHHSPrivacySecurity@michigan.gov.