

Guidelines for Dispersing Patient Information  
for Nursing Student Clinical Assignments that Meet the HIPAA Regulations

Developed by  
Oregon Nursing Leadership Council  
Education Committee

These guidelines are to be used by faculty in development and review of their own practice policies. They are not intended to be an exclusive statement of all actions that are to be carried out by nursing faculty. Instead they are a listing of the minimum expectations in order to be HIPAA compliant when sharing patient specific personal information.

A general guiding principle for having and using any clinical information/data is that no person should be able to link the information that is shared back to a specific individual. Specific implementation of the guidelines may vary, as the school must abide by the rules and regulations present in a particular clinical facility. The ONLC Education committee recommends that in the case of a conflict between these guidelines and the policy established by a school or facility, the more stringent standard should prevail.

**Each nursing program should reinforce the policy that no portion of the patient's medical record should ever be photocopied. A patient's name, medical record number, or social security number should never be used on any recorded information.**

These guidelines have been broken down into five sections that are inclusive of most situations where clinical information must be shared: information that stays within a facility, information that is transmitted outside the facility, information shared between instructor and student for grading purposes, electronic transmissions, and use in the clinical environment.

- 1) Guidelines for patient assignment information that stays within the facility:
  - a) When posting student assignments, information should be placed in a location that is inaccessible to the general public
  - b) Student assignment information that is posted in a staff accessible area should only list the patient's name and room number
  
- 2) Guidelines for patient assignment information going outside of the facility that should **not** be used if it will identify the individual (including all written work, clinical worksheets, patient care plans etc.).

## **DO NOT USE**

- a) Initials
- b) Birth date
- c) Date of admission
- d) Name of facility
- e) Medical Record Number
- f) Name
- g) Photocopies

## **USE**

- a) Age
- b) Gender
- c) Room number: in facilities having a four digit numbering system you may use the last three digits; in facilities having a three digit numbering system you may use the last two digits
- d) Medical Diagnosis or surgical procedure
- e) Medications, lab or diagnostic results and other care information as may be found on a Kardex

### 3) Guidelines for dispersal of written/typed information from instructor to student:

- a) Follow all guidelines listed in (2)
- b) Written information should be given to the student in a manner that prevents others from intercepting it. For example place the information in a sealed envelope in the student's mail box at the school or hand the information to the student directly
- c) Written information should not be posted in a location to which the public has access

### 4) Guidelines for electronic transmission of information:

- a) Follow the guidelines as listed in (2)
- b) E-mail should not be used unless the transmission is encrypted and can only be deciphered by the intended recipient
- c) When using fax transmission use only validated fax lines – check the transmission is accurate before sending materials
- d) Do not use wording such as “patient assignment” or “clinical assignment” in the subject line on the fax cover sheet or the encrypted e-mail
- e) Use a fax cover sheet that clearly identifies the recipient and has a privacy disclaimer statement on the coversheet

### 5) Guidelines for student having and using patient information while in clinical:

- a) Written information with identifying information that the student carries with him/her in the clinical environment should be kept in a closed portfolio notebook or turned face down if left temporarily in a public area
- b) Recorded data that contains any patient protected health information (PHI) should be shredded when no longer needed. It should not be left in a general trash container or a recycle bin where the information could be accessed by the public
- c) Students should not remove anything from a patient's chart, make copies of documents or print out lab results or diagnostic test results that can be taken from the clinical environment with PHI unprotected

Adapted from Chemeketa Community College HIPAA policy, October 2003  
Title II Subtitle F Section 261-264 of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Public Law 104-191