

Privacy Incident Reporting

Protecting patients' privacy and confidentiality is a fundamental ethical concept and requirement in healthcare. An important part of this protection is promptly and thoroughly addressing and mitigating any privacy incidents that occur and notifying patients (and regulatory agencies) when their health information has been inappropriately accessed, used, or disclosed. The steps and tips detailed below explain what actions you need to take to notify the Privacy Office when you find out about a privacy incident.

When Should You Notify the Privacy Office of an Incident

- When there is a disclosure of patient/research subject information to an incorrect person (whether verbal, paper, or electronic)
- When there is a lost or stolen paper document containing patient/research subject information
- When there is a lost or stolen electronic device (regardless of whether it is encrypted) — also notify the UCSF Police Department at 415-476-1414 and IT at 415-514-4100
- When you suspect somebody is inappropriately accessing a patient's record
- **NOTIFY THE PRIVACY OFFICE AS SOON AS YOU DISCOVER AN INCIDENT** (even if you are still investigating)
- For Medical Center incidents, the person who discovers the incident must notify the Privacy Office by submitting an Incident Report

Filing an Incident Report (for Medical Center Incidents)

- Links to the IR are available in a number of places for easy access (CareLinks, Medical Center Manuals) (Figure 1). You will need to login using your UCSF network credentials
- Once in the IR system, open a new "Confidentiality/Healthcare Information" form (Figure 2)
- Fill in all required fields and include as much information as possible — particularly important information to include is the identity of all involved people, the dates of all significant events associated with the incident, and the event type (Confidentiality/Privacy Event)
- Make sure you fully complete and submit the form to ensure the Privacy Office receives it



Figure 1

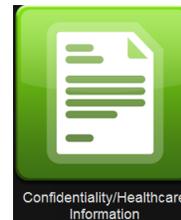
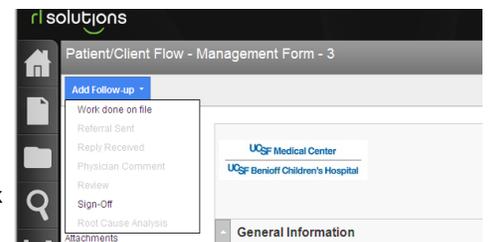


Figure 2

Resolving Filed IRs (Supervisors Only)

- Once the Privacy Office completes its review of the incident it will add a "Follow-up" within the IR and then assign the supervisor of the affected department a task to review and sign-off on the Privacy Office's addition
- The supervisor will then need to go into the IR and complete the following steps:
 - ◇ Open the IR
 - ◇ Click the blue "Add Follow-up" button in the top left of the screen (Figure 3)
 - ◇ Select the "Sign-Off" option
 - ◇ In the pop-up window, fill in **all** the fields and then click on "OK"
 - ◇ Click the "Save and Exit" button in the bottom-right corner of the screen
 - ◇ Notify the Privacy Office representative who assigned you the sign-off task that you have completed these steps—they will then close the IR

Figure 3



Resources

- For IR system-related questions, contact Ivy Kolvan at Ivy.Kolvan@ucsf.edu
- For privacy-related questions, contact the Privacy Office at (415) 353-2750