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Owner Andrea Darr: Vice President and General Manager, Pharmacy Servi
Area Pharmacy

Privacy and Security of Patient Information

PURPOSE

To ensure Health Insurance Portability and Accountability (HIPAA), hospital privacy and security requirements, and credentialing body requirements are maintained in the provision of eCare Pharmacy services in compliance with Texas Administrative Code rule 291.153(d)(4)(C)(i and ii) and Colorado Board of Pharmacy Rule 26.00.20 (h3).

SCOPE

This Privacy and Security of Patient Information policy applies to Avel eCare, LLC.

POLICY

Avel eCare Pharmacy is committed to protecting the privacy of patients and patient information in compliance with federal, state and other applicable laws governing the use and disclosure of protected health information (PHI). Avel eCare Pharmacy will take steps to implement reasonable safeguards to protect patient privacy and the confidentiality of patient information.

1. Access to patient data in the eCare Pharmacy is limited by providing a secure, locked physical location whether in the licensed pharmacy or in a pharmacist's home.
2. Avel eCare Pharmacy employees will obtain proximity badges allowing them access to both the building and the pharmacy.
3. Proximity badges are provided on the first day of employment and are turned in when employment is terminated.
4. In the event that a visitor is seeking access to the pharmacy, the eCare Pharmacy employee will follow the Security of Physical Pharmacy Space policy to determine whether or not to grant them entry.

5. Access to patient data in the order management system or through a facility's EMR is limited by use of pharmacist-specific logon credentials that are known only to the user. As a result, any order processing that is done by a pharmacist is both trackable and retrievable.
6. Access to the order management system is granted only after approval by the Avel eCare Pharmacy Manager.
7. Access to each facility's EMR is only requested after the pharmacist has obtained licensure in the state where the facility resides and is only granted after meeting the requirements of each facility.
8. In compliance with Colorado Board of Pharmacy Rule 26.00.20 (h3), no patient information may be printed for patients being treated in a facility located in the state of Colorado.
9. Any PHI that is printed for use in non-Colorado facilities must remain in the pharmacy at all times and will be placed in the shredding bin when its use is completed.
10. Audio-visual encounters with patients:
 - a. Live video encounters with pharmacists occur only after local facility staff have confirmed the patient or family member's willingness to participate.
 - b. Audio and video input from patient video encounters is live-feed only and will not be recorded.
 - c. If the pharmacist connects to the facility via video and recognizes a situation in which privacy is required, they will immediately disconnect the session and contact the facility via phone.
 - d. The eCare Pharmacy staff will use professional judgment to ask the patient to use a headset or a telephone if topics of a sensitive nature need to be addressed.
 - e. The eCare Pharmacy staff will not discuss any other patients with facility staff during these patient video encounters to avoid divulging PHI.

RELATED DOCUMENTS

None

DEFINITIONS

None

REFERENCES

None

This policy was developed as a guide for the delivery of telehealth services and is not intended to define the standard of care. This policy should be used as a guide for the delivery of service, although originating site or Avel eCare personnel may deviate from this guide to provide appropriate individualized care and treatment for each patient.

Approval Signatures

Step Description	Approver	Date
Policy Owner	Andrea Darr: Vice President and General Manager, Pharmacy Servi	08/2023
Manager Approval	Jeremy Mueller: Pharmacy Manager	08/2023
Manager Approval	Cari Davis: Pharmacy Manager	07/2023

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