



What is PHI/PII? – “Identifiers”

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| <ol style="list-style-type: none">1. Names;2. Geographical subdivisions smaller than a State, including street address, city, county, precinct, zip code, and their equivalent geocodes, except for the initial three digits of a zip code, if according to the current publicly available data from the Bureau of the Census: (1) The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and (2) The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000.3. All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, date of death; and all ages over 89 and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older; | <ol style="list-style-type: none">4. Phone numbers;5. Fax numbers;6. Electronic mail addresses;7. Social Security numbers;8. Medical record numbers;9. Health plan beneficiary numbers;10. Account numbers;11. Certificate/license numbers;12. Vehicle identifiers and serial numbers, including license plate numbers;13. Device identifiers and serial numbers;14. Web Universal Resource Locators (URLs);15. Internet Protocol (IP) address numbers;16. Biometric identifiers, including finger and voice prints;17. Full face photographic images and any comparable images; and18. Any other unique identifying number, characteristic, or code (note this does not mean the unique code assigned by the investigator to code the data) |
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Encryption of PHI/PII as Defined by BAA (sec 4q)

q. **Encryption.** Business Associate may not transmit electronic PHI obtained from Covered Entity or created by Business Associate over any open network unless the data in such transmission is encrypted or secured from unauthorized access or modification in a manner that is consistent with 45 CFR § 164.312 (e)(1) of the Security Rule, or guidance from the Secretary setting forth different or additional requirements or standards. Business Associate shall comply with standards for encryption for MCD, as set forth in AHI Policies and Procedures. For purposes of the section, the term “open network” includes the Internet, extranets (using Internet technology to link to a business with information only accessible to collaborating Parties), leased lines, dialup lines, and private networks. For purposes of this section, the term “encryption” means the reversible coding or scrambling of information so that it can only be decoded and read by someone who has the correct decoding key.



How to Encrypt PHI/PII

Two ways:

- Send via your organization's own secure method that is already in place (ie Barracuda).
- Reply to a secure message from AHI and respond from **WITHIN THE SECURE PORTAL ONLY**. DO NOT SUBMIT YOUR DATA AS A REPLY TO AN EMAIL NOTIFICATION. PHI SHOULD BE SENT THROUGH THE SECURE PORTAL ONLY.

**Should you have any questions about the submission of your data, please contact your compliance officer or AHI Compliance Dept prior to submission.



How to Contact AHI Compliance

To contact AHI Compliance with a Question Prior to Submission of Your Data:

Corporate Compliance Coordinator:

Alicia Sirk ~ 518-480-0111 ext. 103 or
email: asirk@ahihealth.org

Interim Compliance Officer:

Lottie Jameson ~ 518-480-0111 ext. 103 or
email: ljameson@ahihealth.org

To contact AHI IT with Data Transmission Questions:

Health Systems Transformation Technology Director:

Dwane Sterling ~ 518-480-0111 ext. 416 or
email: dsterling@ahihealth.org



Report Compliance and Privacy Breaches

If you suspect a breach of privacy, confidentiality or fraud, waste, or abuse report it to the AHI Compliance Officer:

- **Anonymous Compliance Hotline:** 844-386-2242 (externally)
- **Interim Compliance Officer:**
Lottie Jameson ~ 518-480-0111 ext. 103 or
email: ahicompliance@ahihealth.org
- **Corporate Compliance Coordinator:**
Alicia Sirk ~ 518-480-0111 ext. 103 or
email: ahicompliance@ahihealth.org
- **AHI Online Form or Mail-In Paper Form** (<http://www.ahihealth.org/who-we-are/contact-us/ahi-corporate-compliance-report-form/>)

All reports are confidential and may be anonymous

*****It is illegal for anyone to retaliate against an employee who reports suspected fraud, waste, or abuse.*****