



POLICY TITLE: 203.10 Safeguards – Issuance and Use of Security Badges

Responsible Department: Corporate Privacy Office

Creation Date: 04/07/2003

Review Date: 2021/12/13

Revision Date: 2021/12/13

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PUBLISHED (Released): 2021/12/14

SUMMARY & PURPOSE:

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule provides Federal privacy protections for individually identifiable health information, called protected health information or PHI, held by most health care providers and health plans and their business associates. The HIPAA Privacy Rule protects all "*individually identifiable health information*" held or transmitted by a covered entity or its business associate, in any form or media, whether electronic, paper, or oral. This policy describes the issuance and use of Security Identification Badges.

POLICY:

It is the policy of Baptist Health South Florida, Inc. ("BHSF" or "Baptist Health") to comply with applicable state and federal laws, including those protecting the confidentiality of patient health information and safeguarding of patient information. It is our policy to implement these laws in a way that supports our primary mission to the community regarding the delivery of quality health care in an efficient manner. To ensure that the physical access to any Baptist Health facility is limited and only accessible with the proper authorized access, this policy provides the guidelines for the issuance and use of security badges.

SCOPE/APPLICABILITY:

This policy applies to Baptist Health, its affiliates, all workforce members, and others as described below.

- **Workforce members.** Workforce members means employees, volunteers, trainees, temporary staff, and contractors/consultants who are not independent contractors under *Human Resources Policy 1150 - Independent Contractors*.
- **Medical staff members.** Medical staff members are treated as members of an organized health care arrangement with Baptist Health South Florida and must comply with this policy as if they are workforce members pursuant to their applicable medical staff bylaws.

- **Students.** Employed students are treated as workforce members. Non-employed students (fellows, residents, students) must comply with this policy as if they are workforce members pursuant to the terms of their applicable academic agreements.
- **Independent Contractors and Others.** Independent Contractors and others who have agreed to comply with Baptist Health's policies and procedures as a condition of receiving access to Protected Health Information (PHI) must comply with this policy as if they are workforce members.

PROCEDURES TO ENSURE COMPLIANCE:

1. Issuing
 - a. Security badges shall be issued:
 - i. By the Director of Pastoral Care for Baptist Health members of the clergy;
 - ii. By the Supply Chain Services Department to vendors; and
 - iii. By the Human Resources Department and Security Department to any other workforce member, medical staff member, student, independent contractor or other.
 - b. The Patient Access departments of each Baptist Health facility shall issue wrist security badges/identifications to all patients admitted for inpatient services.
2. Using
 - a. Baptist Health employees and other staff members are expected to wear their security badges when on the premises of a Baptist Health facility.
 - b. Any person without a badge shall be presumed to be a patient's visitor. Visitors may be present only in waiting rooms or the room of a patient who has assented to their presence. Assent may be inferred from the circumstances. If there is any doubt or, in the case of shared rooms, ask the patient, if reasonably possible, before disclosing any patient information in the presence of any person without a badge.

SUPPORTING/REFERENCE DOCUMENTATION:

- Health Insurance Portability and Accountability Act of 1996 as amended from time to time and including any regulations promulgated thereunder (collectively, "HIPAA")
- Applicable Florida State Laws

RELATED POLICIES, PROCEDURES AND ASSOCIATED FORMS:

- Corporate HIPAA Privacy Policies
- Technology & Digital 145 - Permanent Access Badge System
- Technology & Digital 145 – Procedure: Permanent Access Badge System
- Technology & Digital 169 - Visitor Management: Fast Pass System
- Technology & Digital 169 - Procedure Visitor Management System: Fast Pass System
- Human Resources 5275 - Dress Code

ENFORCEMENT & SANCTIONS:

1. Reference: Corporate HIPAA Privacy Policy 10000-74220-605.20 Sanctions for Privacy Violations
2. Violations of this policy will be determined by the Chief Privacy Officer in consultation with the appropriate levels of department leadership and appropriate Human Resources management level. Reference: HR policies 5250 Employee Conduct and 5300 Corrective Action.
3. Violations of this policy may lead to disciplinary action up to and including termination.
4. Enforcement of this policy will be performed by Baptist Health South Florida's Privacy Office in conjunction with Human Resources, as circumstances may dictate.