

# MARSHALL UNIVERSITY INFORMATION TECHNOLOGY COUNCIL

## Policy ITP-31

### Email and Computer Mediated Communication of PHI - EXCEPTION FOR REMOTE TRANSCRIPTIONISTS

#### **General Information:**

**1.1 Scope:** Applies to transcriptionist who provide service to clinical departments of SOM/UP&S

**1.2 Authority:** Marshall University Information Technology Council

**1.3 Passage Date:** 11/18/2003

**1.4 Effective Date:** 11/18/2003

**1.5 Revision Date:**

**1.6 Controlling over:** Marshall University

#### **Exception Summary**

This exception allows for the transmission of electronic protected health information (PHI) via secured file upload by remote transcriptionists retained by the Marshall University Joan C. Edwards School of Medicine / University Physicians & Surgeons (SOM/UP&S). It is granted in accordance with the SOM/UP&S HIPAA Security Policy "[Email and Computer Mediated Communication of PHI.](#)"

#### **Rationale**

SOM/UP&S makes use of transcription services provided in some cases by transcriptionists who are located remote to the Marshall University Medical Center. These transcriptionists create word processing documents and require a means of transmitting them to recipients within SOM/UP&S. Because a mechanism has been developed by the school of medicine's Division of Information Technology and Medical Informatics (DITMI) to allow for password-protected, 128-bit SSL-encrypted uploading via a WWW interface, an exception is granted to the normal prohibition against the transmission of PHI through computer mediated communication.

#### **Parties Involved**

This exception applies to transcriptionists who provide service to clinical departments of SOM/UP&S.

### **Details Concerning Computer Mediated Communication Permitted**

This exception permits only the secure uploading of transcription document files via specific web pages designated by DITMI and encrypted with a 128-bit Secure Sockets Layer (SSL) certificate (example: <http://musom.marshall.edu/surgerytranscription/> ). Access to the directories containing files uploaded via this interface is restricted to transcriptionists working within the Marshall University Medical Center building by means of Windows network domain and user authentication.

Adoption Granted by Michael J. McCarthy, SOM/UP&S HIPAA Security Officer, on [date].  
Reviewed by UP&S HIPAA Security Committee on [date].

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