Policies, Procedures, & Forms Yale University Procedures

HIPAA Procedure 5035 PR.1 Uses and Disclosures of PHI for Fundraising Revision Date: 9/20/2013

Uses and Disclosures of PHI for Fundraising1

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Yale University will include in its Notice of Privacy Practices a statement that it may use demographic information and limited health care information in order to contact the individual for fund raising purposes.

Yale University will use only the minimum amount of protected health information necessary to accomplish its fundraising purposes, and at most, will use only the following information to facilitate fundraising efforts with its patients (unless the patient's Authorization is obtained):

- Demographic Information, including name, address, telephone number and date of birth.
- Dates of health care provided to the individual
- Department of service
- Treating physician
- Outcome information, such as whether or not the patient responded well to treatment but not the nature of the treatment itself
- Health insurance status

In accordance with the minimum necessary policy (<u>See HIPAA policy 5037</u>), if any of the information listed above is not needed for a given fundraising purpose, that information will not be accessed.

In any fund raising material communicated to patients, the Development Office, or other departments in consultation with the Development Office, will include a statement on how the individual may opt out of receiving any further fund raising communications, such as:

"If you wish to have your name removed from the list to receive fund raising requests on behalf of Yale University in the future, please contact us at: (phone, fax, email and address)."

Individuals who opt out of future fundraising at a clinical service locations will be noted in EPIC where applicable. In areas which do not use EPIC, the opt-out information should be forwarded to the Development Office where a list of opt-outs is maintained.

The Office of Development will review any list it uses to raise funds to ensure that individuals who have opted out of receiving fund raising communications do not receive such communications. Through the Office of Development, Yale University has established data management tools to ensure that patients included in the University's alumni affairs and development database will only be contacted for fundraising purposes in accordance with this procedure. The Alumni Services group of the Office of Development will assist all schools, departments, programs and other affiliated organizations in the use of these data management tools.

The official version of this information will only be maintained in an on-line web format. Any and all printed copies of this material are dated as of the print date. Please make certain to review the material on-line prior to placing reliance on a dated printed version.