

HIPAA FAQ on human research during the COVID-19 outbreak

For questions, contact hipaa@yale.edu or 203-432-5919

Have HIPAA requirements been waived in response to the COVID-19 pandemic?

No. DHHS Office for Civil Rights announced, however, that they may use discretion in enforcement actions taken as a result of using non-standard telehealth mechanisms during the current crisis.

What methods can be used for telehealth visits?

Currently, Epic MyChart telehealth is the preferred method to conduct telehealth visits. However, in some cases the Epic system may not work and other options such as Zoom can be considered. Zoom is considered a secure platform but cannot be used for recording patient interactions. Note that telehealth requires specific consent language under state law. For assistance on appropriate consent and telehealth practices please contact ymtelehealth@yale.edu

May I use non-standard telehealth options to perform research visits?

Yes. Research patient visits may be conducted and billed using non-standard telehealth services. Research participants should be informed that a non-standard telehealth method is being used and given the option not to take part in the visit should they choose.

May I use personal devices to work remotely during this time?

Yes. Personal devices may be used for remote work with certain limitations to ensure the security of any PHI accessed on the device. See <https://its.yale.edu/remote-work-clinical-faculty-and-staff-working-covered-entity>

How should information collected during a non-standard visit be handled?

Information received during patient visits that are normally documented in Epic should continue to be documented in EPIC. Information that normally is not stored in Epic should be saved on a secure Yale network. Patient information should not be stored on a personal device.

How can research participants send study data to us when they aren't seen on campus?

Patients can take photos of study diaries, questionnaires and other materials on their personal phones and send those images to the research team via email to a yale.edu email address or text the image to a Yale-secured phone.