



**HIPAA Privacy Procedure #10**

Effective Date: April, 2003  
 Reviewed Date: February, 2011  
 Revised Date:  
 Scope: Radiation Oncology

**Use or Disclosure of Protected Health Information in Media Relations**

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**Policy Expectation:**

Washington University (WU) has adopted a Media Authorization Policy that defines the circumstances under which written Authorization is required to Use or Disclose PHI for the purposes of media relations, publicity, promotion, advertising, education or publication in printed media, radio, television and all types of electronic media.

**Why is this important?**

- Compliance with all HIPAA privacy regulations is required of all Radiation Oncology Divisions creating, collecting or holding PHI regarding Individuals.
- Failure to comply may result in being liable for civil and criminal penalties.

**What do you need:**

Copy of HIPAA Policy on Use or Disclosure of Protected Health Information in Media Relations

Steps:	Additional Information
<p>1. Request from internal or external media for a <u>story</u> to be included in a <u>publication, broadcast or electronic media distribution: publicity, promotion, advertising or educational endeavor</u>; or Request from internal or external media for an <u>image</u> to be included in <u>publicity, promotion, advertising or educational endeavor</u>:</p> <ul style="list-style-type: none"> <li>• Direct all such requests to the Medical Public Affairs Office.               <ul style="list-style-type: none"> <li>• Medical Public Affairs staff will contact a provider with a request to identify an appropriate Individual for the story.</li> </ul> </li> </ul>	

<ul style="list-style-type: none"><li>• Provider will contact the designated Individual with a request to participate in the story.</li><li>• If the Individual verbally agrees, the provider shall contact the Medical Public Affairs staff member who will in turn contact the Individual.</li><li>• Medical Public Affairs staff guides the Individual through completion and signature of the Media Authorization before any contact with the media representatives seeking the story.</li><li>• Medical Public Affairs staff provides a copy of the completed and signed Authorization to the Individual.</li><li>• Medical Public Affairs will document the transaction including the Individual's name, effective date and expiration date in their logging system.</li></ul>	
<p><b>2. Employment of Freelancers:</b></p> <ul style="list-style-type: none"><li>• Employ freelancers for media, communication, promotion and/or advertising purposes only when there is a Business Associate Agreement in place.</li></ul>	