# **Using Aliases to Protect Privacy in Healthcare**

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Developing policies and standard procedures when working with patient aliases is one way to both respect patient privacy but also ensure the accuracy and integrity of patient data.

As defined in AHIMA's *Pocket Glossary*, an "alias" is "a name added to, or substituted for the proper name of a person; an assumed name." AHIMA's e-HIM Work Group on Security of Personal Health Information notes, "Special circumstances may arise in which patient identification or access to individual patient records may require anonymity or special precautions, such as in the case of celebrity or high-profile individuals, political figures, pro-athletes, victims of crime, domestic violence, child or vulnerable adult abuse, litigation, organ donors, and prisoners." Leave the proper name of a person; an assumed name." AHIMA's e-HIM Work Group on Security of Personal Health Information notes, "Special circumstances may arise in which patient identification or access to individual patient records may require anonymity or special precautions, such as in the case of celebrity or high-profile individuals, political figures, pro-athletes, victims of crime, domestic violence, child or vulnerable adult abuse, litigation, organ donors, and prisoners."

## Privacy is a Federal Right

The right to privacy and confidentiality is protected by the US Constitution, professional code of ethics, and legislation. The "Privacy Act of 1974" (Public Law 93-579) states, "The right to privacy is a personal and fundamental right protected by the Constitution of the United States." In 1996, the Health Insurance Portability and Accountability Act (HIPAA) strengthened the federal protection of health information and the privacy of persons receiving healthcare services. The HIPAA Privacy Rule defined how covered entities can use protected health information (PHI). The privacy of PHI is entrusted to health information management (HIM) professionals and efforts to keep information secure include physical, technical, and administrative safeguards as specified in the HIPAA Security Rule. Aliases provide one way for HIM to protect a patient's privacy.

## **Use of Aliases**

In addition to legislation and rigorous policies, procedures and technological efforts have been implemented in healthcare organizations to keep protected health information (PHI) private and limited in its release. Aliases are also often used in place of a patient's legal name to provide an added level of identity protection for patients at risk, especially during episodes of active care.

Aliases are often used in healthcare because an individual's medical information is considered more sensitive than other personal information. It is important to institute organizational controls for handling aliases to ensure data quality.

Reasons for full identity restriction may include:

- A patient's presence in the facility poses a threat or danger to the patient and/or staff
- Knowledge of the patient's presence compromises his/her position in the community
- Patient is a public personality
- A request is received to use an alias

Unfortunately, potential threats to patients, providers, staff, and even physical facilities can be anticipated and exacerbated by the presence of particular individuals known to be receiving care. Certain medical diagnoses, especially those that are sensitive in nature, such as mental health conditions, HIV/AIDS, and substance abuse carry negative stigma and may harm an individual's reputation.

The 2008 AHIMA e-HIM Work Group also wrote, "The perceived controversy surrounding diagnoses, procedures, surgeries, and tests such as abortion, family planning, genetic testing, and cosmetic surgery makes the related clinical documentation a

high-risk category. Abortion, family planning, and genetic testing are controversial due to personal and religious beliefs and insurance qualifications. Individuals, particularly public figures, are often scrutinized and harassed by the media for details regarding cosmetic surgery."<sup>2</sup>

Aliases are commonly used by celebrities, politicians, and people in the public eye or whose notoriety tempts unauthorized access or disclosure by workforce members and other parties.

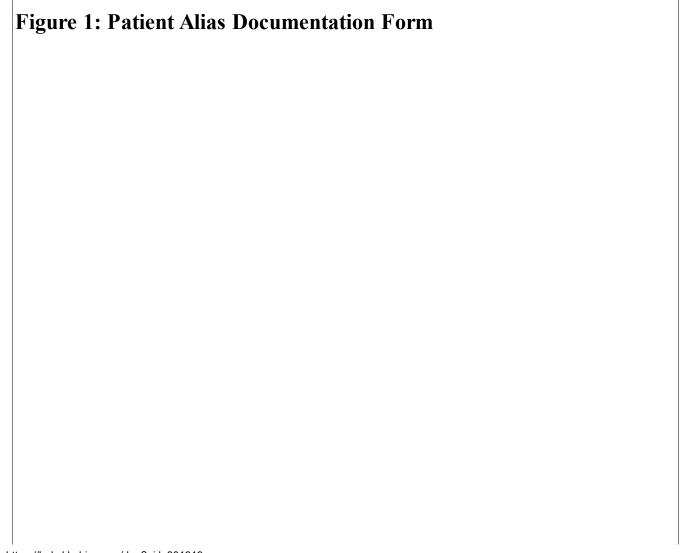
To protect patients, staff, and healthcare entities, policies and procedures for managing use of aliases should be developed, and electronic health record (EHR) system features and functionality should be designed to assure patient privacy.

## **Patient Education Important**

The use of aliases in healthcare settings may present a challenge to the continued care and safety of patients in much the same way fragmented or missing patient information affects the health record. According to an article written by an AHIMA work group in 2015 on e-HIM quality, "Inaccurate data threatens patient safety and can lead to increased costs, inefficiencies, and poor financial performance." <sup>3</sup>

This has a greater chance of occurring if an individual uses multiple aliases or different aliases at patient encounters or at various healthcare sites. It is important for patients who use aliases to understand the possible risks involved with records that cannot be combined for a complete record of their care. For this reason, consistent use of the same alias is recommended.

Although a healthcare organization cannot control the patient's selection of an alias (or the policies and procedures of other healthcare entities), it should ensure that its systems link all the component parts of a patient's records when aliases are used.



tient's Legal Name & MRN#; tient's Approved Alias Name;	
staff Person/Title of who is completing this Form:	
A. The request originated from:	
☐ 1. Patient	s when the patient cannot initiate this restriction.
	facility poses a threat/danger to the patient and/or staff, or a Health System facility/practice compromises his/her
C. Check the following when completed:	
1. Spoke with the patient/requesting par	ty and determined that the request is appropriate.
	t has already been admitted to a patient care unit.
D. Notified Departments, as follows:	C Observed
<ul> <li>☐ Admitting (if patient admitted)</li> <li>☐ ED Registration</li> </ul>	☐ Pharmacy
	Diagnostic Imaging (PACS)
Charge Nurse	Diagnostic imaging (FACS)
☐ Charge Nurse ☐ Security [when patient safety involved] ☐ Provider of Care for this visit (Attending / Admitting Physician)	
Security [when patient safety involved] Provider of Care for this visit (Attending / Admitting Physician)  structions/Note: Regarding the Alias Name, the patien lect the alias name or permit a name proposed by the mmon name or current inpatient's name; 2) Evaluate is already been admitted; 3) Complete the notification is Documentation Form into the EHR.	Blood Bank  HIM  ht, family, Senior Registration Staff or Nursing Supervisor may a patient or family. They will 1) Ensure that the alias is not a the need for transfer to another room or unit if the patient in check list, as indicated in C; 4) Scan the completed "Patient"
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## **Using a Patient Alias Documentation Form**

A Patient Alias Documentation Form (Figure 1 above) can be used to document a patient's decision to use an alias in place of the patient's legal name during the episode of care. Information collected on the form should include:

- Who can request an alias both internally and externally (patient, family, legal representative, security, law enforcement, clinical staff)
- Who can approve the use of an alias and the alias name chosen
- The reason for request of the alias name
- Parameters for standard alias format (numeric, alphanumeric, length, etc.)
- Notification of other departments
- Communication with the patient or representative
- Name change procedures for all paper and electronic records

Additional policies and procedures should be developed to address the following:

- Change of the alias name on the record back to the patient's legal name post-discharge for payment and operations issues
- Process for handling release of information requests received for records under both the alias and legal names
- Use of the patient's legal name and demographic information for treatment, payment, and operations purposes

It is important to note that many of the back-end processes, such as notifying other departments about alias requests and changing the alias to the legal names in various systems post-discharge are critical steps that are often assigned to the HIM department.

See Figure 2 below for a sample Use of Alias Policy and Procedures form.

## Figure 2: Example of Alias Policies and Procedures Form

INSTITUTION NAME	POLICY AND PROCEDURE		
	EFFECTIVE DATE: Jan 2016	REVIEW DATE:	REVISION DATE:
	SUBJECT: ALIAS NAMES		RESIDING MANUAL: Health Information Management SECTION: 8
AUTHOR: APPROVED BY:			POLICY NUMBER:
			PAGE NUMBER: 1 of 2

#### I. PURPOSE

The purpose of this policy defines the use of Alias functionality when it is determined that a patient requires full identity information restriction. Note: The use of a patient alias should be approached cautiously as there are patient safety and data integrity issues involved.

### II. SCOPE:

This policy applies to all employees and patients of Health System.

### III. POLICY:

ABC Health System will utilize information system functionality to allow alias names when:

- Patient's presence at the practice and/or facility poses a threat or danger to the patient and/or staff.
- Knowledge of a patient's presence at the practice/facility compromises his/her position in the community (facility or other).
- Patient is a public personality.
- Use of alias is requested by patient, family, security, law enforcement or clinical staff

#### IV. PROCEDURE:

#### A. When to Use:

- 1. To be used when a patient requires full identity information restriction:
  - a. Patient's presence at the practice and/or facility poses a threat to the patient and/or staff.

- b. Knowledge of a patient's presence at the practice/facility compromises his/her position in the community (facility or other).
- c. An alias can be requested by patient, family, security, law enforcement, clinical staff, etc.
- 2. The Alias name replaces the patient's legal name during the admission/encounter. Name changes require users to enter a reason for change.
- 3. Approval of the alias must be obtained from Registration Leadership (Director, Manager, Supervisor, Coordinator, or Lead Rep) or the Nurse Administrator (Nursing Supervisor) or other designated leader as determined by the organization.
- 4. Prior to approval:
  - a. Complete the "Patient Alias Documentation Form" and scan into EHR using document type "other" with a description of "Patient Alias Documentation." See Figure 1 for the form.
  - b. Notify the patient's healthcare insurer (unless patient has requested a restriction)
- 5. The patient or patient's representative must sign consents and other documents with both legal and alias names.
- 6. Users must enter a patient type of "Alias," or other identifier, when using an Alias name. The patient type is changed in EHR systems for internal control and communication to indicate that the name on the record is not the legal name. Healthcare providers and staff should maintain privacy protection practices as with all other patients.
- 7. User must remove patient type of "Alias" upon discharge.
- B. Information System Functionality: (NOTE: Information system functionality for changing names and patient type will vary based on the EHR system used. Organizations should document and communicate the process.)

### V. AUTHOR / CUSTODIAN / APPROVALS:

Author: Health Information Management

Approvals:

## **Select Health IT Systems that Allow Aliases**

Various electronic health record (EHR) systems and master patient index systems allow for management of aliases, and organizations should select EHR products that offer functions and features that accommodate use of aliases and protect the privacy of high-risk groups. Features to look for include:

- A system that accommodates alias selection/name editing to mask patient identity
- A system that coordinates existing encounters through a merge/aliasing process
- A system that allows for documentation of a reason for an alias
- VIP indicators that restrict identified patients and encounters to those individuals with permission to access these encounters and patients

### **Notes**

[1] AHIMA e-HIM Work Group on Security of Personal Health Information. "Ensuring Security of High-Risk Information in EHRs." *Journal of AHIMA* 79, no. 9 (September 2008): 67-71.

[3] AHIMA Work Group "Assessing and Improving EHR Data Quality (2015 update)." Journal of AHIMA 86, no. 5 (May 2015): 58-64.

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