

New International Standard for Health Information Privacy Workforce Education

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Maintaining the privacy of personal health information (PHI) is important whenever information is gathered, be it for the primary purpose of delivering healthcare, or secondary uses such as clinical research and population health. According to the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), privacy is the “freedom from intrusion into the private life or affairs of an individual when that intrusion results from undue or illegal gathering and use of data about that individual.”¹

The Need for Privacy Education

Privacy concerns are not new in the healthcare field. However, new privacy challenges have been introduced as more technologies, such as medical devices and mobile health (mHealth) applications, are integrated with health information technology (HIT) products, such as electronic health records systems (EHRs).

Digitized healthcare information can be shared between these devices, mHealth, and other HIT applications within and across healthcare organizations. With the emergence of state, regional, and national electronic information exchanges, patients are becoming more concerned about their information privacy.

The increasing interests in electronic sharing of health information between patients, providers, payers, researchers, public health authorities, and other stakeholders contribute to the growing need for information privacy education for the workforce in the healthcare sector. Clinicians, health information managers, administrative staff, contractors, and others who may come in contact with health information all need to be educated about protecting privacy of PHI.

Yet, even with increasing demands to ensure the privacy of patient information in the electronic environment, privacy education guidelines for the healthcare workforce have yet to be standardized.^{2,3} Despite legal and cultural differences around the world, workforce members need to be taught, in a standardized way, the basic principles and practices protecting PHI. This needs to be done to ensure health information systems’ interoperability and enhance information sharing.

There are various programs on privacy education that exist today at colleges and universities in the US, Canada, Australia, and the European Union. Developing countries that are implementing EHRs and mHealth applications also recognize the need to address concerns with protecting patient privacy in a consistent manner. Healthcare organizations across the globe need guidelines on how to consistently execute education of the workforce.

Standardized privacy education may assist the global community in identifying and addressing gaps and harmonizing patients’ privacy safeguards. The competencies for standardized privacy education have been developed by the Global Health Workforce Council.⁴ The competencies include curricular considerations for education on business practices, standards, laws, and regulations for patients’ privacy protection on the following topics:

- Health information governance principles and practices
- Concepts of healthcare information privacy, confidentiality, and security
- Laws, regulations, and business practices
- Health information systems interoperability (semantic, technical, and functional) and information sharing
- HIT standards for information privacy and security
- Patient identity and verification processes
- Medical identity theft
- Data security processes

- Information privacy protection safeguards
- Professional obligations related to protection of health information privacy

Additional efforts are needed to standardize the development and delivery of privacy educational programs across the globe, to tailor these competencies to roles and responsibilities of the healthcare workforce, country-specific regulations, and jurisdictional and cultural differences in the management of sensitive patient health information.

Developing a Global Standard for Privacy Education

A new technical report (TR) will be published by the ISO Technical Committee (TC) 215 Health Informatics entitled “ISO TR 18638—Components of education to ensure health information privacy” (ISO TR 18638). This report specifies the essential educational components required to establish and deliver a training program on supporting health information privacy in a healthcare organization. The report is aimed at those responsible for planning, establishing, and delivering health information privacy education.

The ISO TR 18638 is based on international guidelines for information protection, including the Organization for Economic Cooperation and Development (OECD) Guidelines on the Protection of Privacy and Trans-border Flows of Personal Data; United Nations Guidelines for the Regulation of Computerized Personal Data Files; European Union Data Protection Directive (also known as Directive 95/46/EC); and the Asia-Pacific Economic Cooperation (APEC) Privacy Framework. Basic educational content specified in the report is developed according with the principles formulated in these guidelines.

The ISO TR 18638 defines that it is the responsibility of the healthcare organization to define and apply best practices on patients’ privacy protection, and to ensure workforce members understand their privacy protection responsibilities. The report provides the components of privacy education—such as administrative safeguards, patient rights on personal health information, privacy breaches, and other topics—within the context of roles and job responsibilities.

According to the ISO TR 18638, the health information privacy protection training program at a healthcare organization should enable personnel to:

- a. Understand the importance of privacy and confidentiality of PHI and their relationship to information security in a continually changing healthcare environment
- b. Understand privacy legislation, policies, principles, and practices of applying those within an organization
- c. Understand their roles in protecting patient privacy when managing patient information and the consequences for violations
- d. Recognize potential threats to patient privacy, as well as understand risk mitigation approaches
- e. Acquire knowledge of legal, administrative, technical, and physical safeguards
- f. Learn effective approaches for protecting patient privacy in relation to patient information
- g. Understand the behaviors required to deal with personal and sensitive information

The target audience of a health information privacy training program is personnel involved in creating, managing, and using/reusing patient information. In ISO TR 18638, the targeted audience is divided into six groups based on the roles and responsibilities within an organization. They include:

1. Health professionals (clinicians)
2. Health information managers
3. Administrators
4. IT personnel
5. Researchers
6. Other personnel that comes in contact with healthcare information, such as pastoral care workers, counselors, or contractors

In addition, the technical report also identified the need for privacy education for patients, their family, and/or representatives and caregivers. All existing and new healthcare personnel should be required to attend the training program, and the training can be repeated regularly to address HIT changes as needed.

The technical report will be helpful for healthcare organizations that are implementing their own privacy protection practices and procedures. It will contribute to overcoming diverse variation between countries in the context of legislation and culture on protecting PHI. The standard is expected to be published in 2016.

To participate in the development of international standards for privacy, security, and safety of health information at ISO Technical Committee 215 Health Informatics, please contact Diana Warner, secretary of the ISO/TC215 Work Group (WG) 4: Information Privacy, Security and Safety, at diana.warner@ahima.org. For more information on the work of ISO/TC215, visit the [ISO website](#).

Notes

[1] International Organization for Standardization and International Electrotechnical Commission. “[ISO/IEC 2382-8: 2015 – Information technology vocabulary – Part 8](#).”

[2] Luna, Daniel, Alfredo Almerares, and John Charles Mayan, III et al. “[Health Informatics in Developing Countries: Going beyond Pilot Practices to Sustainable Implementations: A Review of the Current Challenges](#).” *Healthcare Informatics Research* 20, no. 1 (January 2014): 3-10.

[3] Alkraiki, Abdullah, Thomas W. Jackson, and Ian Murray. “The Role of Health Data Standards in Developing Countries.” *Journal of Health Informatics in Developing Countries* 6, no. 2 (2012): 454-466.

[4] American Health Information Management Association Global Health Workforce Council. “[Curricula Competencies for Health Information Management Professionals](#).”

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