

**CO**RONA**VI**RUS **D**ISEASE 2019 (COVID-19)

Guidance for Using Authorization Forms

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| **Audience:** Marketing and Communications Leaders, Social Media Managers |
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Guidance for Use of Colleague, Non-Colleague and Patient Authorization Forms

When preparing to use images, stories, names and situations either internally or externally, you must ensure your subjects sign and return the most appropriate authorization form.

Standard “media consent” or “release forms” do not satisfy HIPAA requirements. It is critical that all Trinity Health ministries use the HIPAA-compliant patient health information release authorization or other approved forms for colleagues and/or those who are neither colleagues nor patients (i.e., vendors and general members of the community).

You can find them on the [COVID-19 Comms Resources Page](http://www.trinity-health.org/coronavirus-comms-materials) or on the [Pulse Marketing and Communications Page](https://intranet.trinity-health.org/web/systemoffice/marketing-and-communications).

Reminders:

* PHI does not lose its protected status under HIPAA even if it has been disclosed by the patient or other entities.
* Patients involved in matters that have become public record are accorded the same privacy rights as all other patients.
* It is rarely permissible to post a link to a patient story published elsewhere or to re-share publicly reported PHI without the patient’s authorization.
  + In social media, if you are sharing curated PHI from another ministry and cannot confirm that that the approved Trinity Health PHI Release authorization has been completed, you can still share the post; you may not, however, comment on it.
* Patients can disclose any information about themselves or their care details without restriction.
* Ministries are held to a different standard under HIPAA. If a story includes information about one of our patients, we must obtain the patient’s authorization (via a HIPAA compliant authorization form) before re-posting or linking to it.
* Exercise caution. Out of respect for guidance from the CDC and actions many in our communities are following carefully, please do not externally share any images in which un-masked non-colleagues and/or community members are not social distancing themselves appropriately.