



April 1, 2016

Colleagues:

We have long emphasized, through policy and communications, the importance of keeping patient information confidential, not discussing patients in public, and only accessing patient information for legitimate clinical and business reasons. Our Medical Staff should already know that accessing our database to check on the health of a neighbor, a relative, a high profile patient or a colleague is a violation of HIPAA and a violation of Main Line Health policy that, as an organization, we take very seriously.

We have decided to implement an electronic tool to help us consistently monitor for inappropriate access to patient records. After a thorough evaluation of the options, we chose a platform called FairWarning®.

FairWarning uses proprietary software to review and categorize internal and remote access to patient records and provides alerts to designated Main Line Health leaders when such access appears to be inappropriate or out of the ordinary. Those designated individuals will review the alerts for their areas of responsibility to determine whether the flagged access was appropriate.

Each alert from FairWarning will be investigated. Inappropriate access is a serious matter. If access is confirmed to be inappropriate, HIPAA violations will be adjudicated through mechanisms set forth in the Medical Staff Bylaws and Rules and Regulations. Depending on the facts of the inappropriate access, intervention can range from coaching to an investigation by the Medical Executive Committee, which could lead to termination of Medical Staff membership. Notification of the access may need to be provided to the patient and to regulatory authorities.

Thank you for what you do every day to care for our patients' health and to safeguard their information. Our addition of FairWarning's monitoring technology further demonstrates our commitment to patient privacy and data protection.

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