

Section: Privacy	Number: 18.21.G.v4
Subject: OTN Member Site Facsimile Transmission of Personal Health Information	Associated Document Form Number: N/A
Effective Date: June, 2007	Last Reviewed Date: March 2019
Last Revised Date: March 2019	Next Review Date: March 2021

PURPOSE

Ontario Telemedicine Network (OTN) Member sites may have occasion to send and/or receive facsimile (i.e. fax) transmissions related to the arrangement of telemedicine events. These facsimiles may include personal health information (PHI) which must be protected and safeguarded under the [Personal Health Information Protection Act, 2004](#).

OTN has an interest in ensuring that personal health information is protected when being used to arrange for and conduct telemedicine events. OTN has developed these guidelines to help Member sites establish their own secure facsimile practices in accordance with organizational policies and procedures.

GUIDELINE

These guidelines have been developed to minimize the risks associated with faxing documents containing PHI and are intended to reduce the likelihood of errors occurring during the faxing process. It is acknowledged that these guidelines may be implemented in a variety of unique settings and, as such, some of the listed strategies may not be practical or reasonable. OTN Member sites may use this document as a resource in formulating their own written policies governing the use of fax technology.

CONSIDERATIONS FOR FAX MACHINES

1. When purchasing a fax machine, consider models that have the capability to program a list of frequently used fax numbers.
2. When selecting a location for a fax machine, try to isolate it in an area with restricted access, an area where it is not visible or an area where confidential information can only be read by authorized personnel.
3. If personal health information is to be transmitted, it is prudent to designate a fax machine for this purpose only. A separate fax machine should be used for day-to-day operations.
4. Consider designating an individual "to be responsible for the handling of all incoming and outgoing faxes, as well as a backup for the designated individual to deal with instances in which the designated individual is unable to fulfill his or her role."¹ (e.g. vacation, sickness)

Only authorized individuals should be granted access to transmit and/or receive personal health information from the fax machines.

PROCEDURES FOR SENDING

1. All faxes should be accompanied by a cover sheet containing the following:
 - I. The name, address and phone number of the sender and the intended recipient.
 - II. A notation indicating the total number of pages faxed.

¹ Information and Privacy Commissioner/Ontario (IPC). [Guidelines on Facsimile Transmission Security](#) (revised January 2003).

- III. A statement that the information contained in the fax is confidential and may be subject to the Personal Health Information Protection Act, 2004 (PHIPA).
 - IV. A statement that explicitly states that the fax should not be distributed, copied, or disclosed to any unauthorized persons.
 - V. A person to contact and/or provide instructions for the recipient to follow when a fax has been received in error.
2. Frequently used faxed numbers should be maintained on a 'master list'. This list should be checked regularly to ensure that the numbers are accurate and current, and a semi-annual review of pre-programmed numbers should be completed.
 3. Use validated, pre-programmed fax numbers where possible, and regularly check for accuracy. Having programmed numbers will save time and ensure that faxes aren't sent to unknown sites inadvertently.
 4. Fax numbers that aren't programmed and must be dialed should be verified for accuracy on the machine's display window, to ensure they have been keyed in correctly.
 5. Where there is any doubt concerning the accuracy of the listed fax number, the sender should verbally ensure that the number is correct by phoning a person in the office of the recipient and confirming the fax number. Taking this step will help to ensure that the fax transmission arrives at its intended destination.
 6. If possible/practical, consider calling the recipient of the fax prior to sending to notify them of the incoming fax. This allows the recipient to contact the sender if he or she has not received the information within a reasonable period of time.
 7. After sending a fax, an activity confirmation report can be printed. This report can be verified against the fax number to make sure that it was sent to the correct number and can be retained as proof that the fax was sent to the intended recipient.
 8. If you are notified and/or discover that a fax you have sent containing personal health information has been transmitted to an incorrect location in error, notify your immediate supervisor, your privacy officer and/or risk manager as per facility policy/practice. If it is a facsimile related to OTN (e.g. a referral form), the OTN Privacy Office should also be notified (privacy@otn.ca). Remember not to send personal health information (e.g. patient name) via e-mail.

PROCEDURES FOR RECEIVING

1. Check the number of pages received against the transmitted fax cover sheet or the fax activity confirmation report (if no fax cover sheet is transmitted).
2. Contact the sender at once if pages are missing.
3. If the facsimile contains personal health information, consider contacting the sender to confirm that the fax has been received.
4. If a misdirected fax is received, the recipient should contact the sender immediately and confirm with the sender whether the errant fax should be returned to the sender (by means other than fax) or destroyed. The recipient should not forward the fax to the intended recipient.

REFERENCES

["Faxing Dilemmas in an age of Privacy"](#) 2010

Information and Privacy Commissioner/Ontario (IPC). [Guidelines on Facsimile Transmission Security](#) (revised January 2003).