| Subject:<br>**Email Encryption Policy** | Page<br>**1** | Policy #<br>Version: 1.2 |
|---|---|---|
| Title:<br>**Identifiable Health Information in Email** | Revision of:<br>**5/02/2017** | Effective Date:<br>**10/01/2015** |
| | | Removal Date: |

## I. PURPOSE:

While including protected health information (PHI) or other personally identifiable information (PII) about a patient or research participant in any e-mail message or attachment is discouraged, encryption will provide an added layer of security for sending sensitive data within Northwestern-affiliated environments.

## II. POLICY STATEMENT:

Email message and attachments are required to be sent encrypted when containing PHI or PII. Encryption may occur automatically, manually or placed into quarantine as defined by the Procedure Statement.

## III. PROCEDURE STATEMENT:

**Automatic Encryption**

Messages containing sensitive data sent from your @northwestern.edu e-mail address to or from recipients within Northwestern-affiliated domains are automatically encrypted and do not require additional effort. Northwestern-affiliated domains enabling automatic encryption include:

- northwestern.edu
- cadencehealth.org
- cdh.org
- childrensmemorial.org
- lfh.org
- livingwellcrc.org
- luriechildrens.org
- nm.org
- nmff.org
- nmh.org
- northwesternmedicine.org
- ric.org
- sralab.org

*NOTE: Messages sent using your Google Apps account (e.g. @fsm.northwestern.edu) are NOT automatically encrypted.*

**Manual Encryption**

Messages containing PHI or PII data sent from your @northwestern.edu e-mail address to non-Northwestern-affiliated environments will require manual encryption.

Manually encrypted messages will be automatically quarantined. The recipient will receive an e-mail notice instructing them to register with Cisco Envelope Service and retrieve the message.

To manually encrypt an email, include one of the following phrases including the brackets in the subject line:

[secure]
[confidential]
[hipaa]
[phi]
[hipaa-phi]
[send secure]
[private]

e.g., *SUBJECT: Patient Test Results [secure]* or *SUBJECT:[private]Patient Test Results.*

**Special Cases**

Email messages will be automatically encrypted and quarantined if manual encryption is not used and the following circumstances are detected:

- Messages are suspected of containing PHI or PII sent from your @northwestern.edu e-mail address to non-Northwestern-affiliated environments
- Messages are suspected of containing PHI or PII that are auto-forwarded from an @northwestern.edu account to an email account outside of approved Northwestern-affiliated domains (including your @fsm.northwestern.edu, @u.northwestern.edu, and @md.northwestern.edu accounts)

The intended recipient of an encrypted and quarantined email message will receive an email from the Cisco Envelope Service that gives instructions on how to retrieve the email message. It will require a one-time registration with the Cisco Envelope Service where the user will need to establish a login and password. A link to registration instructions for this service is included in every email notifying the user of a quarantined email message: http://www.feinberg.northwestern.edu/misc/email/cres.pdf.

## IV. PERSONS EFFECTED:

All Feinberg faculty, staff, students and trainees using northwestern.edu email addresses.

## V. POLICY UPDATE SCHEDULE:

No less than every five (5) years, but more frequent updates may be conducted as required.

## VI. REVISION HISTORY:

10/01/2015 - New policy effective.
12/01/2015 - Updated list of Northwestern-affiliated email domains enabling automatic encryption.
05/02/2017 - Updated list of Northwestern-affiliated email domains enabling automatic encryption.

## VII. RELEVANT REFERENCES:

Feinberg Information Technology E-mail Accounts:
http://www.feinberg.northwestern.edu/it/services/student/email.html

Feinberg Information Technology Standards & Policies:
http://www.feinberg.northwestern.edu/it/standards-policies/index.html

NUIT Policies, Guidelines, and Practices: http://www.it.northwestern.edu/policies

NUIT Data Access: http://www.it.northwestern.edu/policies/dataaccess.html

NUIT Use of Computers, Systems, and Networks:

http://www.it.northwestern.edu/policies/csn-use.html

NUIT Guidelines for Security and Confidentiality of Data Files:
http://www.it.northwestern.edu/policies/uccpolicy.html