



TRANSPORTING PHI WITHIN THE MAIN FACILITY AND BY MOTOR VEHICLE PROTOCOL

OVERVIEW

The intention of this protocol is to prevent the unauthorized disclosure of protected health information (PHI) as a result of transporting PHI from one location to another.

DEFINITION

- **Satellite Office:** An office, which operates under DMHSA. (i.e., Children's, Healing Hearts, Drug and Alcohol, Residential Recovery Homes, etc.)
- **"Off-site" for purposes of this protocol:** Any location outside of DMHSA main facility.
- **Transport:** To physically move PHI (whether on paper, or on mobile digital devices and electronic storage device such as a laptop computer, smartphone, USB/thumb drive or a disk) from one location to another, by any means including by foot, motor vehicle, airplane or other means of transportation.
 - For example: Moving a record from the main facility to a satellite office.

STANDARDS OF CARE

- Whenever a hardcopy version of PHI (actual medical records, shadow charts, photocopies and extra printouts) is removed from the main facility, it must be secured and protected at all times.
- Only the minimum amount necessary to accomplish the purpose of use should be transported outside of the medical records office.

PROTOCOL

Transporting Records within the Main Facility:

- Records and PHI should be covered or turned over, so that personal identifiers are not visible to casual observers when transporting records within the main facility (i.e., from office to office, from medical records to an office, etc.).
 - For example: Holding the record so the name is towards the staffs' body, placing the records upside-down in a cart, carrying the records upside down, using an envelope, etc.
- PHI that is being transported within the main facility, such as from one office to another, will be attended or supervised at all times, or otherwise secured to avoid unauthorized access, loss and/or tampering.
 - Records should never be left unattended.

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Transporting Records in a Motor Vehicle:

- Additional measures must be taken to secure PHI that is being transported outside of the main facility to assure confidentiality and integrity in the event of an accident, theft, or other unforeseen event.

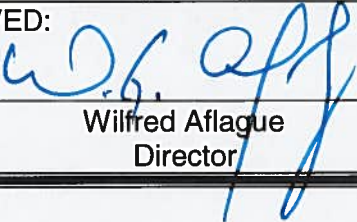
- During transportation, staff is responsible for maintaining the privacy and security of all PHI they are transporting, storing or accessing off-site.
 - This includes PHI and ePHI; computers and mobile devices that contain PHI; storage media such as CD-ROMS, flash drives, and memory cards that contain PHI; and printed documents that contain PHI.

- The record should be transported in a secure container such as a locked box, briefcase/bag, or sealed envelope and it should be transported without stops, if possible.

- PHI or electronic devices that contain PHI (i.e., laptop) should not be left visible in the car. If stops must be made the vehicle must be secured (locking doors, rolling up windows, etc.) and the PHI must be secured in the vehicle.
 - The PHI must be placed in the trunk of the automobile.

 - If there is no trunk the PHI must be placed in an area of the vehicle that cannot be easily seen from the outside.

APPROVED:



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Date:

