

Policy Manual

Subject: Security of Health Information in the Community

Section: ADM – Legal Issues

Number: ADM-c-150

Approved: Chief Executive Officer

Date: 004.05.15

POLICY

Employees of CapitalCare are responsible for the health information that they carry in the community. Staff will follow this procedure to reduce security risks to health information:

PROCEDURE:

1. Providing Health Information to Other Agencies:

1.1. Facsimile

- a. Staff will follow the safeguards in Appendix C of CapitalCare policy ADM-c-70 (Health Information Privacy and Security).
- b. Health information received by fax at a staff member's home (see section below "*Appropriate Storage and Disposal of Health information*") must be returned to the care facility at regular intervals for secure storage or appropriate disposal.

1.2. E-mail

- a. Staff are not to send health information over Internet (external) e-mail. This is not acceptable practice without encryption software, as stated in policy IS-a-10 (Acceptable Usage Policy for Electronic Communications).
- b. Staff may send health information over Intranet (internal) email where it is available. Intranet email can also be accessed from staff homes with relative safety using Webaccess (for those staff who have email accounts). Any health information that is printed from the computer must be returned to the care facility at regular intervals for secure storage and appropriate disposal.

1.3 Telephone

- a. Staff may share health information with an authorized recipient during a telephone conversation.
- b. Staff must not leave health information over voice mail.

2. **Appropriate Storage and Disposal of Health Information in Homes of Staff:**

- 2.1. Faxes may be received in the staff member's home. These faxes along with any other health information must be stored in a closed file and kept in a secure area of the home to which other individuals in the home do not have access.
- 2.2. Transitory health information (i.e. information that is not kept as a permanent part of the client file) must be returned to the care facility on at least a monthly basis for shredding.
- 2.3. Health information that is to be kept on file must be returned to the care facility on at least a monthly basis for secure storage.

3. **Transporting Health information:**

- 3.1 Staff must keep client records inside closed containers and in an out of sight location inside vehicles (e.g. the locked trunk of a vehicle). Staff who have vehicles without trunks must store client records in an out of sight location inside the passenger area of the vehicle (e.g. under a seat, in a Rubbermaid type container).
- 3.2 Staff vehicles must be locked whenever they are left unattended.
- 3.3 Staff must not leave health information in their vehicles overnight.
- 3.4 Staff will carry with them the least amount of health information that they need for the purpose, i.e. the pertinent information regarding clients they are scheduled to see that shift.
- 3.5 Staff will carry with them health information that has the highest possible level of anonymity. For example, when using day timers, include first names, the initial of the last name, and the date and time of the visit – no other information is needed.
- 3.6 When entering a client's home, staff are to take only the necessary documents pertaining to that client into the home inside a folder or closed bag. Information regarding other clients is to be secured in an out of sight location within vehicles.
- 3.7 If there is no suitable out of sight location for health information within a vehicle, a staff member may take client records with them when they enter a client's home. However, these other client records must be stored in a folder or closed bag and remain in sight at all times during the visit.

4. **Proper Stewardship of Records:**

Staff must always be aware of the client records in their possession. If the information carried is lost or stolen, staff must be able to identify the clients who were affected as well as the types of information kept on those clients. Also, staff will need to recreate as much of the information as possible.