

COMPLIANCE CORNER

Securing Protected Health Information (PHI) in Motion



What we know for sure about HIPAA and PHI:

1. We must secure paper records that include PHI.
2. We must report an incident if it involves the loss or theft of any such records.
3. Many Nova employees have access to PHI information.

However, what we should know but sometimes forget is:

1. How important it is to secure PHI at all times.
2. PHI is always in motion because we are always working with PHI in some format

Here are a few precautions we need to take to always ensure that PHI in motion is still protected and secure:

- ❖ If PHI is not in use, lock it up:
 - Store it in a lock cabinet and secure the key
 - Never leave it on an open shelf in your office, copy room or hallway
- ❖ If PHI is in use during the work day never leave it unattended:
 - Turn over or cover the information so that no personal identifiers are visible
 - Always shut your office door during the day if you have PHI in your office
- ❖ Printing PHI:
 - Avoid printing PHI when possible
 - When printing, be sure to select the correct printer

- If you print to the wrong printer in error, ensure that you locate the printer and have your document retrieved or destroyed
- Always pick-up print materials from the printer as soon as it is printed
- At the end of the day make sure that print or fax information containing PHI is removed or destroyed
- ❖ When manually mailing a document with PHI, make sure that no PHI information is visible in the envelope window:
 - The name and address should be the only information visible
 - When possible, use a confidential stamp on the envelope
- ❖ Securely dispose of PHI by always using a secure shred bin



All PHI or Confidential information should be cleared off your desk and surrounding work area at the end of each work day to minimize unauthorized exposure:

EXAMPLES

- ✓ Phone logs
- ✓ Mailing list
- ✓ Medical Records
- ✓ Provider Files
- ✓ Financial Statement
- ✓ Personnel Files

For additional guidance on Nova requirements for securing PHI, please be sure to review our Corporate Compliance Policy:

CC-0702: Clean Desk and PHI Safeguard