

15.4 RECORD SECURITY AND RECORD TRANSPORT

RECORD SECURITY

Policy: Montana Title X clinics must assure that all medical records are confidential and safeguarded against loss or use by unauthorized persons.

Procedure:

1. Only personnel authorized by the clinic director may have access to chart and filing areas and electronic health records (EHR) systems.
2. All paper medical records must be secured by lock when not in use. Computer hardware used for accessing EHR systems must be secured in an area accessible only by authorized EHR users when not in use.
3. Laboratory reports or other sections of a medical record temporarily out of the medical record will be provided the same security and will be under the direct supervision of the personnel using such records.
4. Medical records and computer hardware used for EHRs must not be placed in areas of public access, unless in the possession of or monitored by staff personnel.
5. All lists, rosters, extracts or other documents bearing client names or other identifying information must be provided security.
6. Client records must be de-identified if a portion of a chart is copied for educational use, chart audits or any other purpose.
7. Medical records and computer hardware providing access to EHR systems must not be removed from the clinic site unless absolutely necessary. Clinics finding it necessary to remove medical records from the clinic site must follow the procedures below.
8. Access to electronic health records (EHRs) must be protected by staff specific identification (ID) and password.
9. Staff is not allowed to share EHR IDs and passwords.
10. Clinic using the EHR software must adhere to the manufacturer security process.
11. Risk assessments should be conducted yearly or when a significant physical change occurs in the clinic to ensure that EHR system safeguards are adequate.

RECORD TRANSPORT

Policy: Client medical records contain personal and sensitive information and are highly confidential documents. Montana Title X clinics must assure that all medical records are safeguarded when transporting them between clinic sites. Only the required amount of medical information necessary to accomplish client care should be transported.

Procedure:

When client identifiable information or client records are taken off-site, the following guidance must be observed:

1. Any medical records taken off site must be checked out so that their location is able to be tracked.
2. Records must be placed in a locked box for transportation.
3. Medical records should never be left unattended in a vehicle, visible to the public or in easily accessible areas.
4. Medical records must be returned to the clinic site as soon as possible after use at the outside location.
5. On return to the clinic, medical records must be logged in and/or accounted for.
6. If any medical records are lost, stolen or improperly accessed by others, the staff member must immediately notify the Title X clinic and the Montana Family Planning Program of the HIPAA breach per the Montana Title X Family Planning Administrative Manual Policy 2.1 *HIPAA Compliance*.