 <p style="text-align: center;">Heritage Provider Network & Affiliated Medical Groups</p>	Program: HIPAA Compliance			
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	Authored by: Compliance Sub Committee	Date: 01/01/2012	Revised by: Sandy Finley	Date: 02/02/2015
	Approved by: Compliance Committee	Date: 02/02/2015		
Title of Policy: Paper Document Controls				

PURPOSE:

To ensure that employees of Heritage Provider Network and its Affiliated Medical Groups (HPN) use proper controls when handling all documents containing Protected Health Information (PHI) in paper format.

POLICY:


It is the policy of Heritage Provider Network and its Affiliated Medical Groups that all forms of paper PHI are protected in accordance with federal and state laws and regulations, including HIPAA. This includes the confidentiality of patient’s medical, financial, personal and other information regulated by these guidelines. See also HPN policy: Disposal of Protected Health Information and Faxing of Patient Medical Information.

RESPONSIBILITY:

All employees of Heritage Provider Network and its Affiliated Medical Groups.

PROCEDURES:

1. To ensure compliance, every employee has a responsibility to handle such protected paper PHI by the following:
 - a. All forms of paper PHI shall not be left unattended unless specifically locked up in a secured location.
 - b. All forms of paper PHI shall not be left unattended at any time in vehicles and not checked in as baggage on commercial airlines.
 - c. Visitors must be escorted to areas where PHI is contained and PHI must not be visible, unless they are authorized to review PHI.
 - d. Disposal of PHI is only conducted in compliance with HIPAA regulations and HPN policy: Disposal of Protected Health Information. This includes utilizing an external destruction vendor and obtaining evidence that all PHI has been destroyed according to Federal, State and HIPAA laws.
 - e. PHI must not be removed from any of the HPN premises except for routine business purposes.
 - f. Faxed information containing PHI must not be left unattended and all fax machines must be placed in a secure area.
 - g. Faxes must contain a confidentiality statement notifying persons receiving the information in error to immediately destroy such information.

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- h. PHI being mailed is to be done via secured methods and disks and other transportable media must be encrypted.
- i. Returned/undeliverable mail containing PHI is forwarded back to sender to confirm/update the recipient's address and, as appropriate, to notify the recipient of returned mail.
- j. Shredder bins must be made readily available for proper storage and destruction of PHI documents.
- k. Shredder bins must be clearly marked and not filled to overflowing.