

 <p style="text-align: center;">Heritage Provider Network & Affiliated Medical Groups</p>	Program: HIPAA Compliance			
	Policy No.	Effective Date: 01/01/2012	Page - 1 -	
	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: Safeguard of PHI during Transportation				

PURPOSE:

To establish guidelines for confidentiality and privacy of Protected Health Information (PHI) when the information is transported by employees or contracted courier services.

POLICY:

Heritage Provider Network and its Affiliated Medical Groups are responsible for transporting and safeguarding Medical Records and Billing Records pertaining to individual patients from the various off-site locations to include, but not limited to storage facilities. Confidentiality and privacy is maintained at all times when information is being transported by employees or contracted courier services.

RESPONSIBILITY:

Compliance Officer, Corporate Compliance Officer, all Employees and all Business Associates

PROCEDURES:

1. During department orientation the Human Resources Personnel will review HIPAA Privacy rules pertaining to the transport and safeguard of Patient Health Information with the company couriers.
2. The courier will ensure that all Protected Health Information is safeguarded from anyone's view by placing this information or documentation in a covered transport box.
3. All Protected Health Information transported by the company couriers will be transported in a protected area and properly secured in the vehicle.
4. All transportation vehicles will be locked at all times when left unattended.
5. The vehicle will have appropriate locking mechanism, and will remain locked at all times except during loading and unloading.
6. Any violation of these outlined procedures will be dealt with in accordance with the Sanctions of HIPAA Violations Policy.

REFERENCE:

45CFR § 164.530