

**San Bernardino County
Department of Behavioral Health**

**Transportation of Protected Health Information (PHI)
Procedure**

Effective Date 01/08/2016
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Purpose To provide guidance to Department of Behavioral Health (DBH) staff to ensure physical transportation of client protected health information (PHI), within the DBH system, is conducted in a safeguarded manner and tracked appropriately.

Definitions

Requesting Staff: The staff member initiating transportation of PHI records.

FPM Storekeeper: The FPM staff member that responds to FPM requests to pick-up records and physically transports records from one location to another.

Receiving Staff: The staff member/clinic receiving the package containing PHI. (This may be the staff member or clinic that requested the package be sent, but ultimately they are the “recipient”.)

Physical Transportation Responsibilities DBH staff are to request pick-up, transportation and delivery of client PHI for business operations utilizing the DBH Facilities and Project Management (FPM) Storekeeper as follow:

Responsible Party	Required Action
Requesting Staff	<ul style="list-style-type: none"> • Consider the possibility of sending records via email according to Electronic Transfer of Client PHI Policy (encryption must be used when sending outside of the DBH system/Network) and/or by facsimile if possible according to the Sending Confidential Information by Facsimile Policy • Submit a FPM request utilizing the online FPM Repair/Service Request Form on the DBH intranet • In the “Description” indicate contents of records/package notating “PHI” to prompt special tracking, medical record number, and intent of delivery (e.g., “medical record to be reviewed and returned to Medical Records by January 10, 2015 with confirmation to release to attorney”) • If intended job is to deliver multiple records to one recipient for the same purpose, one request can be made

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**Physical
Transportation
Responsibilities
(continued)**

<p>Requesting Staff (continued)</p>	<ul style="list-style-type: none"> • If intended job is to deliver multiple records to multiple recipients or the same recipient for the different purposes, one request per record in separate packaging should be submitted • Seal and label package in appropriate envelope and/or box • Sign for package pick-up • Follow Completion of Transportation steps in this Procedure, as applicable <p>Note: Requesting staff/clinics/programs are responsible for documenting removal of records in their respective clinic utilizing their respective chart room check-in/check-out process. For clinics that do not have an existing chart room log, the General Chart Room Log can be used.</p>
<p>FPM Storekeeper</p>	<ul style="list-style-type: none"> • Prompted for special pick-up and tracking • Print two copies of the request with "Received from" and "Delivered to" print/signature lines (one copy for signing and FPM records and one for Receiving Staff/Clinic/Program to keep) • Pick-up package from Requesting Staff and obtain signature under "Received from" line • Drop-off package to intended clinic/program site and obtain Receiving Staff signature under "Delivered to" line • "Close-out" request, indicating completion status and scan signed request into FPM repository for PHI transportation requests
<p>Receiving staff</p>	<ul style="list-style-type: none"> • Accept package and sign for receipt • Follow Clinic/Program Tracking Responsibilities in this Procedure <p>Note: Receiving staff/clinics/programs are responsible for documenting receipt of records in their respective clinic utilizing their respective chart room check-in/check-out process. For clinics without an existing chart room log, the General Chart Room Log can be used.</p>

NOTE: If transportation is required and DBH FPM Storekeeper is unavailable to meet time constraints, it is the discretion of the Program Manager or direct supervisor to authorize transportation by designated staff. Records must be transported in a locked bag or locked/sealed box while in transition to the

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**Physical
Transportation
Responsibilities
(continued)**

Intended destination and actions under **Clinic/Program Tracking Responsibilities** in this procedure must be followed once delivery is made. Security bags and/or boxes are to be purchased by the individual clinic/program. The key to the bag or box is to be kept separate on the transporter's person and shall be given to the recipient with the bag/box or contents are to be removed at delivery and bag/box are to be taken back by transporter when delivered.

**Clinic/Program
Tracking
Responsibilities**

Once the package containing PHI is delivered to the intended clinic or program site, the clinic/program tracking responsibilities are as follows:

Responsible Party	Required Action
Receiving staff/clinic	<ul style="list-style-type: none"> • Log receipt of package using the Tracking of PHI Records Delivered Log • Draft routing slip to Intended Recipient indicating directive (e.g., "medical record to be reviewed and returned to Medical Records by January 10, 2015 with confirmation to release to attorney"; "charts returned from QM – audit complete, records to remain in clinic") • Deliver package to Intended Recipient and obtain recipient's signature on the Tracking of PHI Records Delivered Log • Once Intended Recipient is done with package and returns for routing or to place in designated storage area, log final outcome in Tracking of PHI Records Delivered Log <p>Note: All completed Tracking of PHI Records Delivered Logs are to be maintained in a folder (electronic or hard copy) within each clinic.</p>
Intended Recipient (e.g., Clinician, Program Manager, Medical Records, etc.)	<ul style="list-style-type: none"> • Obtain package from Receiving Staff and sign the Tracking of PHI Records Delivered Log indicating receipt • Read the routing slip accompanying the package and notate intent of delivery (e.g. return by date, intended use, etc.) • Return package to designated clerical staff to complete FPM request for pick-up/return or to place in designated area for storage

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**Completion of
Transportation**

It is the responsibility of the DBH staff member whom initiated the physical transportation of PHI to confirm and record completion of the intended job. The following table indicates steps to be taken:

If ...	Then ...
Staff sends records/package to DBH clinic/program site to be returned by a certain date	Staff must follow-up with receiving clinic when records are due if not returned by designated return by date and document appropriately (e.g., keep record of receiving clinic's correspondences/status of records)
Staff sends records/package to DBH clinic/program site to remain at that location	Staff must follow-up with receiving clinic to confirm receipt of package and document appropriately (e.g., keep record of confirmation via email, etc.)
Staff is transporting records/package on his/her person	Staff must document delivery by follow-up email to recipient
QM Admin is initiating record transportation	QM Admin will maintain a log for tracking records going out and in, which will include FPM Storekeeper's signing records out/in and staff signing records in, as appropriate. If QM Admin does not receive records by required return date, QM clerical staff must follow-up with intended recipient.

**Related Policy
or Procedure**

DBH Standard Practice Manual:

- COM0948: [Transportation of Protected Health Information Protected Health Information \(PHI\) Policy](#)
- COM0905: [Confidentiality of Protected Health Information \(PHI\) Policy](#)
- COM07-0904: [Medical Records Security Policy for Outpatient Services](#)
- COM0944: [Privacy or Security Incident Policy](#)
- COM0931: [Access and Amendment of Medical Records Policy](#)
- COM0931-01: [Access and Amendment of Medical Records Procedure](#)
- COM0909: [Electronic Transfer of Client PHI Policy](#)
- COM0901: [Sending Confidential Information by Facsimile](#)