

**EMPLOYEE GROUP INSURANCE  
TREATMENT OF PROTECTED HEALTH INFORMATION**

<b>Section 8.3: Safeguarding PHI</b>	<b>Page:</b> 1 of 2
<b>Effective Date:</b> April 14, 2003	

**POLICY**

EGI shall safeguard PHI so as to minimize Uses and Disclosures of PHI that violate the HIPAA Privacy Standards or the policies and procedures set forth in this Manual.

**8.3(1) Written Documents**

- a. Papers containing PHI shall be picked up as soon as reasonably possible from publicly accessible locations, such as copiers, mailboxes, and conference room tables, and shall be appropriately filed or destroyed. PHI shall not be left unattended unless the area is secured from unauthorized access.
- b. File cabinets containing PHI shall be locked when not in use, and only individuals with access to the PHI in the file cabinets shall be able to unlock the file cabinets.
- c. Documents containing PHI shall not be discarded in trash bins, recycle bins, or other publicly accessible locations but shall be shredded by EGI or placed in a secure bin for disposal. Microfilm and microfiche shall be cut into pieces or chemically destroyed.

**8.3(2) Computer Use**

- a. Passwords shall not be shared and shall not be written down where others can find them. A computer user with access to PHI via the computer shall log off or use a password protected screen saver before leaving his or her workstation for any significant period of time and shall not allow someone else to use his or her computer under his or her password in his or her absence.
- b. A computer shall not be positioned such that PHI may be viewed by unauthorized individuals.

**8.3(3) Mailing PHI**

Records containing PHI, if mailed, should be sent in a sealed envelope marked "CONFIDENTIAL."

**8.3(4) Faxing PHI**

- a. All pages of a facsimile containing PHI shall be marked "CONFIDENTIAL." The facsimile cover letter shall contain a notice of disclosure that informs the recipient that the information is confidential, identifies the proper recipient, and directs any other person who receives the fax to notify the sender immediately of the error.

- b. To help ensure that faxes are sent to the correct destination, any frequently used numbers or programmed numbers shall be periodically checked for accuracy, and new fax numbers shall be verified with the intended recipient before any PHI is faxed.
- c. If EGI learns that a fax has been misdirected, the recipient shall be reached by phone or by fax and instructed to destroy the misdirected fax.

### **8.3(5) Verbal Communications**

EGI shall reasonably safeguard PHI that is orally Used or Disclosed in order to limit incidental Uses and Disclosures of the PHI. Conversations, whether face-to-face or by telephone, that involve PHI should be conducted in private (e.g., behind closed doors) or spoken softly, without excessive use of the subject's name.

### **8.3(6) Electronic Storage of PHI**

- a. EGI shall reasonably safeguard PHI that is electronically stored in order to limit incidental Uses and Disclosures of PHI. Electronically stored PHI may be located on The University of Texas at Austin administrative mainframe, on the EGI FTP server, on EGI PC workstations, on System Administration's Office of Information Resources servers or network attached storage devices, or, on electronic storage media such as cartridge tapes, compact disks, or floppy discs.
- b. Electronic PHI stored by EGI in accordance with paragraph (a) on any computer system or storage device shall be protected by User ID and Password protection.

### **8.3(7) Separation of Group Health Plan Records from Employee and other Non-Group Health Plan Information**

- a. EGI shall keep all records concerning Group Health Plans containing PHI separate from other Non-Group Health Plan Information including employment-related information kept by EGI and/or The System.
- b. PHI held by EGI shall not be Used or Disclosed in connection with any Non-Group Health Plan functions including employment-related functions performed by EGI and/or The System without an Authorization permitting the Use or Disclosure.

### **REFERENCES/CITATIONS**

45 C.F.R. § 164.530(c)

65 Fed. Reg. at 82,561-62, 82,745-46 (Dec. 28, 2000); 67 Fed. Reg. at 53,193-95 (Aug. 14, 2002)