

# Great Rivers Behavioral Health Administrative Services Organization

Policy Title: <b>Removal of PHI From Office</b>	Policy No. <b>5032.00</b>
Category: HIPAA Privacy & Security	Date Adopted: 02/14/2020 Date Revised
Reference: Washington State Health Care Authority (HCA) Contract with Great Rivers Behavioral Health Administrative Services Organization	

## POLICY

- 1.1. Great Rivers Behavioral Health Administrative Services Organization (Great Rivers BH-ASO), in an effort to be compliant with the Privacy Rules of HIPAA's Administrative Simplification provisions, sets out, in this policy to optimize the security of the removal of PHI from its offices.
- 1.2. Great Rivers BH-ASO believes, in general, all PHI (Protected Health Information) must remain at its offices. In certain circumstances, with the approval of the Director or HIPAA Officer, PHI may be taken out of the office. This may take the form of traveling employees or employees working from home. Remote access of PHI is covered in Remote Access Procedure.

## PROCEDURE

- 2.1. Originals are not taken off site. Copies are made for transport. Paper copies are shredded when no longer needed. Electronic copies are deleted.
- 2.2. A log is kept of PHI taken off site. All PHI taken off site is locked in a suitable container such as a locking file box or briefcase. When not in use, PHI removed from the office is protected from access by unauthorized persons using locking containers or software encryption if PHI is stored on removable storage media.
- 2.3. The above items apply to PHI in paper files, laptops, and electronic removable storage media such as computer disks, tape back-up media, and USB jump drives.
- 2.4. All PHI on electronic removable storage media and laptops are encrypted and password protected.
- 2.5. Penalties for violation of the Removal of PHI from Office Policy vary depending on the nature and severity of the specific violation. Any employee who violates the Removal of PHI from Office Policy is subject to discipline up to and including termination from employment in accordance with Great Rivers BH-ASO's Sanction Policy.

## POLICY SIGNATURE

DocuSigned by:

*Edna J. Fund*

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Edna J. Fund, Chair  
Great Rivers BH-ASO Governing Board

4/14/2020

Date