

Guidance: Transporting Medical Records and PHI

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All medical records and documents containing patient protected health information (“PHI”) must be adequately secured to help ensure our patients’ information is not exposed to unauthorized individuals. All staff and faculty should follow these standards when transporting medical records, documents and portable media devices (such as laptops or flash drives) containing PHI:

Transporting Within The Medical Center

When carrying medical records throughout the Medical Center, make sure PHI is facing away from public view. Use an envelope or accordion folder. While transporting PHI on a rolling cart, place the records in secure containers or cover the records. Never leave PHI (including portable media devices) unattended.

When Moving Office Spaces

Records, documents containing PHI, or laptops and other portable media devices should not be left in an unlocked or unsecured area. Boxes containing PHI should be numbered, labeled and logged to avoid being misplaced. Never leave PHI, thumb drives, laptops or other portable electronic devices unattended, even temporarily, including in front of buildings or in hallways. Once you reach your destination, make sure all items are accounted for.

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- ❖ We recommend that PHI not be transported off the University of Chicago Medical Center campus, but if you must do so, follow these guidelines:

Transporting From/To Off-Site Clinics

Only transport PHI off-site if you have your direct supervisor's approval and only if it is necessary. Only transport the minimum amount of PHI necessary. Never leave PHI (including portable media devices) unattended, including your car. Maintain a log of files or documents that are leaving the medical center campus. When you arrive at the off-site clinic, immediately make sure all the files you listed on the log are in your possession.

Can I Take PHI Home?

Taking PHI home presents a great risk to not only to The University of Chicago Medicine, but for the patient as well. Not all employees are approved to work from home, and you should consult your direct supervisor or manager whether this is allowed. If you are in a department that does not allow working from home, PHI should never be taken home. If you are approved to work from home, all documents containing PHI and portable media devices must be maintained in a secure location. When you work from home, portable electronic devices including laptops and documents containing PHI should never be viewable to others within the environment.

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Before removing PHI from the University of Chicago Medicine, ask yourself these questions:

1. Can the PHI and laptop be maintained securely while it is out of the office?
2. Will I be able to keep track of and keep secure the PHI or laptop if I make a stop before arriving to my final destination?
3. How will the PHI be tracked while it is out of the office?
4. If the PHI, laptop, or other electronic media is lost or stolen from my car, will I know the information that is at risk?
5. Do I know the proper procedure if the PHI or electronic device/media is lost or stolen?

It is the responsibility of all staff and faculty to secure all patient PHI on campus and off campus.

Any questions/comments/concerns please feel free to reach out to the Privacy Program at:

773-834-9716 or hpo@bsd.uchicago.edu