



Handling of PHI Sensitive Material Procedure (BEN-P010)

The online version of this procedure is official. Therefore, all printed versions of this document are unofficial copies.

1.0 SCOPE:

- 1.1 This procedure describes the process in which Risk Management deals with written Protected Health Information from a member at the Washoe County School District.

2.0 RESPONSIBILITY:

- 2.1 Risk Manager

3.0 APPROVAL AUTHORITY:

- 3.1 Risk Management Senior Technician *(Approval signature on file)*
Signature _____ Date _____

4.0 DEFINITIONS:

- 4.1 RM – Risk Management
- 4.2 PHI – Protected Health Information

5.0 PROCEDURE:

Outgoing US Mail

- 5.1 RM staff assures that any PHI information that will be put in the US Mail system will:
 - 5.1.1 Be sealed and taped
 - 5.1.2 Marked with “CONFIDENTIAL” on all sides of package or envelope
 - 5.1.3 The package and/or envelope are placed in a larger package or envelope with the name and address of designee without “Confidential” marked on it in order to not bring attention to the package and/or envelope.
 - 5.1.4 The package and/or envelope is then place in the normal US Mail.

Outgoing Inter-office Mail and Hand Carried Mail

- 5.2 RM staff assures that any PHI information that will be put in the inter-office mail system or hand carried will follow steps 5.1.1 – 5.1.4 above.

Incoming Mail

- 5.3 When any mail item is received in RM that is PHI sensitive, RM will handle each piece in the following manner:
 - 5.3.1 Each document of mail will be date stamped “RECEIVED” with the current date.
 - 5.3.2 Each document of mail will be stamped “CONFIDENTIAL.”

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- 5.3.3 Placed in a blue folder identified for PHI sensitive material for the appropriate RM staff member, mail will be put in the RM staff member's inbox or
- 5.3.4 The PHI sensitive mail will be hand delivered in the blue folder to the appropriate RM staff member.
- 5.3.5 If there is any mail left in the RM staff member's inbox at the end of the day, the receptionist will lock up the blue folders for the RM staff member in the secured files.

E-Mails

- 5.4 PHI sensitive outgoing E-mails from RM will only be used to send information/data to the health plans business associates.
 - 5.4.1 Health Plan Business associates will have an up to date agreement with Washoe County School District Group Health Plans, which assures their compliance with PHI.
 - 5.4.2 An appropriate disclaimer will be on the bottom of all e-mails stating what to do if the e-mail has been received in error.
- 5.5 Any incoming e-mail that is PHI sensitive will be
 - 5.5.1 Printed out and stamped "CONFIDENTIAL"
 - 5.5.2 The e-mail will be deleted from the system.
 - 5.5.3 The e-mail will be placed in the secured files for resolution and disposition.
 - 5.5.4 Once the issue has been resolved, the e-mail will be shredded or filed in the employees file if appropriate.

Faxes

- 5.6 Outgoing faxes of a PHI sensitive nature will be sent with a cover sheet with a disclaimer and marked confidential.
 - 5.6.1 Outgoing faxes are for WCSD Business Associates or for the member only with authorization.
- 5.7 Incoming faxes that are of a PHI sensitive nature will be stamped "CONFIDENTIAL" and placed in the appropriate RM staff members blue folder.

6.0 ASSOCIATED DOCUMENTS:

- 6.1 Benefit Training of PHI Sensitive Material Procedure - BEN-P017

7.0 RECORD RETENTION TABLE:

<u>Identification</u>	<u>Storage</u>	<u>Retention</u>	<u>Disposition</u>	<u>Protection</u>
Mail	Secured Files	Until resolution	Filed in employee file or shredded as	Standard file cabinet in

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			required	secured office
E-mail	Secured Files	Until resolution	Filed in employee file or shredded as required	Standard file cabinet in secured office
Faxes	Secured Files	Until resolution	Filed in employee file or shredded as required	Standard file cabinet in secured office

8.0 REVISION HISTORY:

<u>Date:</u>	<u>Rev.</u>	<u>Description of Revision:</u>
6/2/05	A	Initial Release
5/15/07	B	Revised 1.1; added last part of sentence 5.3.1; revised language in 5.3.2.

***** E n d o f p r o c e d u r e *****