



# PSYCHIATRIC HEALTH FACILITY POLICY AND PROCEDURES

COUNTY OF SANTA BARBARA  
ALCOHOL, DRUG AND MENTAL HEALTH SERVICES

## Section - MEDICAL RECORDS

Effective: 4/6/2011

Policy- RELOCATION, REPLACEMENT OR DESTRUCTION OF  
ELECTRONIC EQUIPMENT CONTAINING PATIENT HEALTH  
INFORMATION #P03

Revised: 4/6/2011

PHF CEO's Approval

Date: 4/6/2011

Executive Medical Staff Chair's Approval

Date: 4/6/2011

Committee Chair's Approval

Date: 4/6/2011

Form Ref.

### POLICY:

It is the policy of the Santa Barbara County Mental Health Plan (SBC MHP) to fully comply with all relevant state and federal laws, regulations, and contractual requirements relating to medical records, and to comply with relevant professional standards.

The confidentiality of Protected Health Information (PHI) is of vital importance, and all necessary steps must be taken to protect PHI at all times.

Since many copy machines, fax machines, and computers incorporate hard drives and other forms of non-volatile electronic memory, and many such types of equipment are used to create, transmit, and/or store PHI, it is necessary to ensure that such PHI is protected or destroyed as appropriate.

### PROCEDURE:

- A. Whenever electronic equipment which might contain a hard drive or other nonvolatile electronic memory is being relocated, replaced, or destroyed, the following steps will be taken:
- B. The Medical Records Administrator or designee will determine whether or not:
  1. The equipment has been used to create, store, and/or transmit PHI, and
  2. The equipment contains a hard drive or other nonvolatile electronic memory.
- C. If both of the above are found to be true, then the equipment will be treated as electronic PHI by following the procedures below:
  1. The equipment must be stored in a location which complies with HIPAA and other relevant security requirements.
  2. When the equipment is moved, it must be moved under the direct supervision of ADMHS staff.

3. Steps must be taken to ensure that unauthorized persons are unable to access the electronic memory inside the equipment.
4. If the equipment will not be stored in a secure location, or will not be transported under the direct supervision of ADMHS staff, the Medical Records Administrator, MIS Manager, or a designee must ensure that the electronic memory is completely erased or physically destroyed so that it is impossible for any person, including a person with expertise in electronic hardware, to gain access to any information which has been stored.

**ASSISTANCE:** Medical Records Administrator, MIS Manager, Compliance Officer