



UCHealth Guidelines for Utilizing Protected Information (“PI”) while working from home

Secure Transport and Maintenance of UCHealth Protected Information outside UCHealth facilities

General Guidance

UCHealth is committed to ensuring the privacy and security of Protected Health Information (PHI), Personally Identifiable Information (PII) and Personal Information (PI) – hereafter referred to as Protected Information - as required by law, professional ethics, and accreditation and/or licensure requirements.

Transporting PHI Outside UCHealth

1. Whenever possible, transport Protected Information in electronic format (e.g. scan and save to network drive or other location accessible from home via Remote Desktop or VPN).
2. Before transporting outside of UCHealth, paper PHI should be placed in non-transparent envelopes or wrappings or other secure containers such as bins that can close securely. Envelopes/containers should be clearly marked with the names and addresses of the originating and destination locations and the inner documents should be labeled “For Official Use Only.”
3. Only transport the minimum amount of PHI necessary for the work purpose. Never leave Protected Information unattended, including in your car.
4. A chain-of-custody log should be used to document any transfer of paper files or electronic media offsite of a UCHealth facility. Logs should include control numbers (or other tracking data), the times and dates of transfers, names and signatures of individuals releasing the information, and a general description of the information being released. When you arrive at home, immediately make sure all the files you listed on the log are in your possession.
5. At home, all documents containing Protected Information must be maintained in a secure location. When you work from home, portable electronic devices including laptops and documents containing Protected Information should never be viewable to others within the environment.



Definitions:

Protected Health information (PHI): Health information protected under the HIPAA privacy standards' use and disclosure provisions. PHI includes individually identifiable health information that is transmitted or maintained in any form or medium, including electronic, paper or oral. Protected Information (PI): Any or all of Protected Health Information, Personally Identifiable Information, or Personal Information. Workforce Member: Employees, volunteers, students and residents, temporary staff, agency and contracted staff, Board of Directors members, physicians and other credentialed staff who, in the performance of their work for UCHealth, are under the direct control of UCHealth, whether or not they are paid by UCHealth. UCHealth Medical Staff: Includes UCHealth Medical Group employed physicians, University of Colorado physicians and advanced practice providers who are part of the University of Colorado Hospital Authority (UCHA) Medical Staff, and Community physicians.

References:

45 CFR §§ 164.502(j)

45 CFR §§ 164.530(e)