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| <p><b>DEPARTMENT:</b> Compliance</p> <p><b>POLICY TITLE:</b> CMP22 Safeguard of PHI during Transportation</p> |  <p><b>Arizona</b><br/>Priority Care™</p> <p><i>One Goal. One Priority. Your Healthcare.</i></p> |  |
| <p><b>REVIEWED BY:</b> AZPC Compliance Officer</p>  | <p><b>REVIEW DATE:</b><br/>11/08/2019</p>  | <p><b>EFFECTIVE DATE:</b><br/>12/01/2019</p> |
| <p><b>APPROVED BY:</b> Compliance Committee</p>   | <p><b>APPROVAL DATE:</b> 11/11/2019</p>  |  |

**PURPOSE:**

To ensure that Arizona Priority Care (AZPC) establishes guidelines for confidentiality and privacy of Protected Health Information (PHI) when employees or contracted courier services transport the information.

**POLICY:**

It is AZPC’s policy to maintain responsibility for transporting and safeguarding Medical Records and Billing Records pertaining to individual patients from the various off-site locations to include, but not limited to storage facilities. Confidentiality and privacy will be maintained at all times when information is being transported by employees or contracted courier services.

**PROCEDURE:**

1. During department orientation, the Human Resources Personnel will review HIPAA Privacy rules pertaining to the transport and safeguard of Patient Health Information with the company couriers.
2. The courier will ensure that all Protected Health Information is safeguarded from anyone’s view by placing this information or documentation in a covered transport box.
3. All Protected Health Information transported by the company couriers will be transported in a protected area and properly secured in the vehicle.
4. All transportation vehicles will be locked at all times when left unattended.
5. The vehicle will have appropriate locking mechanism, and will remain locked at all times except during loading and unloading
6. Any violation of these outlined procedures will be dealt with in accordance with the CMP20 Sanctions of HIPAA Violations Policy.

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**DEFINITIONS:**

None

**REFERENCES:**

Heritage Provider Network Policies  
45 CFR § 164.530

**APPENDICES:**

None

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**DOCUMENT REVISION LOG**

| <b>Date</b> | <b>Document Modification (including deletions)</b> | <b>Page(s)</b> | <b>Location</b> |
|-------------|--|----------------|-----------------|
| 11/2019     | Converted to AZPC template                         | All            | All             |
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