

STANDARD OPERATING PROCEDURE	
SUBJECT:	EMS Billing
TOPIC:	HIPAA Record Keeping
Reference Number:	EMS-06-014
Effective Date:	July 1, 2006
Date Last Reviewed:	
Signature of Approval:	Frank E. Wright, Fire & Rescue Chief

1.01 **PURPOSE:**

To establish policies and procedures for maintaining and securing medical records compliant with the Health Insurance Portability and Accountability Act (HIPAA). This policy applies to all Winchester Fire & Rescue Department operational personnel. The policy also applies to staff members assisting with the audit and review process.

1.02 **GENERAL:**

To stay within the guidelines of The Health Insurance Portability and Accountability Act (HIPAA) of 1996 to protect healthcare information obtained and safeguard the use of the Protected Health Information (PHI).

1.03 **RESPONSIBILITY:**

It is the responsibility of The Privacy Officer and Alternate Privacy Officer, to thoroughly train and familiarize WFRD members regarding HIPAA policies and procedures.

1.04 **POLICY:**

Access to patient records shall be strictly controlled in compliance with established use and disclosure policies. Access to written/printed protected health information (PHI) records will be controlled by the Privacy Officer or Alternate Privacy Officer. Access to electronic PHI records will be controlled by WFRD appointed information technology staff in conjunction with the City Information Technology Department and Privacy Officer.

1.05 **PROCEDURE:**

- **Report Handling:**

The WFRD Attendant in Charge (AIC) of patient treatment is responsible for completing, printing, and securing the Pre-hospital Patient Care Report (PPCR) which contains PHI for each incident. PPCR's should be handled as follows:

1. One copy should be left at Winchester Medical Center to be included in their patient records, if applicable.
2. One copy should be placed in the Drug box if applicable.
3. The original PPCR copy with signatures shall be placed in the metal lock box located in each station immediately upon return to the station.
4. PPCR's shall remain in the lock box until picked up by Department Information Technology staff or designee.
 - a. PPCR's will be picked up every Monday, Wednesday, and Friday.
 - b. Exceptions to the scheduled pickup days may result from observed holidays.
5. Information Technology staff or designee will immediately bring the PPCR's to the EMS Billing Managers office.
6. The EMS Billing Manager or Captain of EMS will review reports for documentation accuracy and place them in a secured filing cabinet.
7. Some reports may be reviewed by operational EMS personnel or WFRD's Operational Medical Director to meet the Performance Improvement guidelines issued by the Commonwealth of Virginia.

- **Access:**

Winchester Fire & Rescue Department administrative staff and/or the department's Information Technology staff shall accommodate information requests compliant with established use and control policies only (See Appendix A). Any questions regarding legitimacy of requests shall be directed to the Privacy Officer.

- **Tracking:**

Winchester Fire & Rescue Department administrative staff shall maintain a log of all information requests. This log will facilitate audits of all PHI access beyond standard internal treatment, payment and health care operations. The log shall include:

1. Incident number
2. Date accessed
3. Name of person accessing
4. Basis/reason for disclosure
5. Whether document is printed/copied, or simply viewed

- Routine access shall comply with the "minimum necessary standard" and de-identify any PHI to the maximum extent possible.

1.05 **DOCUMENTATION:**

Occasionally, a department document requires a signature by a staff person. In such the Privacy Officer, Alternate Privacy Officer or the Fire & Rescue Chief shall sign the required document.

1.06 **APPENDIX A:** HIPAA Individual Rights PHI Request Form

1.07 **REVOICATION:**

1.08 **REVISION:**