

## STANDARDS FOR PHI IN INDIVIDUAL STAFF OFFICES

Staff are expected to make a reasonable and conscientious effort to safeguard Protected Health Information in their possession. They should adhere to the following minimum guidelines, but should use their best judgment in exceeding these guidelines when a specific situation requires.

Each staff member should keep a desk drawer available which may be used to slide PHI into. PHI should never be left on a desktop when the staff member leaves the office without closing the door.

Staff should close their office doors any time they leave the office.

Staff may, under their best judgment, allow consumers to sit in their office for a period of time unattended. PHI should be placed inside a closed drawer, and the staff member should remain nearby to check on the office periodically. If there is doubt about the consumer's ability to sit for a period of time without looking into drawers, then all PHI should be locked up.

Staff should assist each other by keeping a watchful eye on other offices in their vicinity. They have the authority to investigate any questionable activity in another staff member's office.

At the end of each workday, all PHI must be locked. It may be locked in a desk drawer, in an individual office, or in the file room.

The file room must be kept locked at all times except when a staff member is inside.