Procedure E-1: Tracking, Use & Transportation of Memory Cards & Audio Tapes with PHI Files

I. Obtaining Memory Cards & Audio Tapes

A. Ordering

Memory cards and audio tapes should be ordered via the Clinic Supply Request Form through the SBC-DC and not purchased by clinic staff. Personal memory cards or audio tapes should not be used for PHI files.

B. Initial Storage

1. When delivered, blank memory cards and audio tapes should be checked-in by the MA or OSS on the Camera, Memory Card & Audio Tape Tracking form
2. Blank memory cards and audio tapes should be stored in a locked drawer accessed by an MA or OSS

II. Checking-out Memory Cards & Audio Tapes

A. Staff should check-out a memory card or audio tape with the MA or OSS

B. Both the camera and memory card(s) should be checked-out using the Camera, Memory Card & Audio Tape Tracking form. The same process follows the tape recorder and audio tape.

C. All fields should be completed on the form including the ID numbers of all equipment being used (camera, memory card, tape recorder, audio tape), name of staff requesting the equipment and reason for use. Check one of the following on the form:

1. **MH: PHI Files**
   If the memory card or audio tape will hold PHI files from mental health counseling sessions
2. **General Clinic**
   If the memory card or audio tape will not have any PHI files.
3. **Off-Site Use**
   If the memory card or audio tape will be used anywhere off-site or in another clinic location. Also write-in on the form where the card will be used.
   ***Memory cards and audio tapes with PHI files must be transported by the procedure below.*

D. The MA or OSS should initial for approval.

III. Using & Storing Memory Cards with PHI Files

Memory cards and audio tapes with PHI files will be used for the sole purpose of storing PHI. Cards and tapes will not contain non-PHI files (i.e., general clinic pictures or videos, pictures of staff, etc).

A. Playing PHI Files

1. Playback of video or pictures with PHI may only take place via the SBC camera. Exporting of such files to computers, internet-based applications such as iCloud, social media, etc, email or text messaging is prohibited. The same is true for audio tapes.
2. The use of the camera's USB cable to connect to a computer monitor for playback is allowed as long as the file is not transferred to the computer. Playback must be controlled by the camera.

B. Storing PHI Files

1. Memory cards and audio tapes with PHI files should only be in the camera or recorder when in use. Otherwise they should be locked-up.
   a. Using a Memory Card & Audio Tape PHI Log form, write down the clients' chart number(s) that appear in the PHI files.
   b. Attach the log form to the memory card or audio tape with a clip or band.

c. Place the memory card or audio tape in the Memory Card & Audio Tape Box inside the locked chart file cabinet under the appropriate numbered file.

C. Deleting PHI Files

1. Once a provider is finished with a memory card or audio tape, all files must be deleted. This should be done using the camera or recorder's controls.
2. The Memory Card & Audio Tape Log sheet should be shredded.
3. Once these steps are complete, the card or tape should be checked back in by the MA or OSS via the Camera, Memory Card & Audio Tape Tracking form.

IV. Transporting Memory Cards with PHI Files

Memory cards with PHI files must be transported via clinic courier locked bins.

A. Check-out

1. Make sure the memory card is checked-out on the Camera, Memory Card & Audio Tape Tracking form. The *Off-Site* box should be checked and the destination of the card written-in.

B. Transportation

1. The memory card and its log sheet should be placed into a sealed #10 envelope.
2. The #10 envelope should be placed into a red envelope.
3. The destination of the card should be written on the red envelope (i.e. another clinic or MDHFS).
4. The red envelope is then placed in the clinic's bin to be transported to the SBC-DC.

C. Receiving/Checking-in

1. The MA or OSS at the clinic that receives the memory card should check it in using the Camera, Memory Card & Audio Tape Tracking form.
2. "No" should be written in the *Mem Card Clear?* Column.
3. The card should then be immediately checked out to a provider and placed into the Memory Card & Audio Tape Box inside the locked chart file cabinet.

V. Transporting Audio Tapes with PHI Files

Audio tapes with PHI files should be transported using the same procedure as memory cards. However, if they are needed for practicum purposes, the following may be used instead:

A. Check-out

1. Make sure the audio tape is checked-out on the Camera, Memory Card & Audio Tape Tracking form. The *Off-Site* box should be checked and the destination of the tape written-in.

B. Transportation

1. The provider must ensure there is no PHI identified on the audio tape prior to transportation.
2. The audio tape and its log sheet should be placed into a sealed #10 envelope and placed in an empty locked box.
3. The Mental Health Coordinator must approve the transportation of the audio card on the clinic's Camera, Memory Card & Audio Tape Tracking Form.
4. The locked box with the audio tape must be transported directly to practicum site and then back to the clinic. It may not travel anywhere else.

VI. Orientation & Training

All staff and practicum students will receive orientation and training on these procedures prior to using audio/visual equipment with clients. All staff and practicum students will be updated on any changes to these procedures.