POLICY E: MENTAL HEALTH

I. AUDIO/VISUAL RECORDING

A. Purpose

To establish guidelines regarding the audio/video recording and photography by mental health providers (counselors and interns) in order to observe clients and provide training and professional development of providers.

B. **Consent**

Consent must be obtained via the Mental Health Counseling Audio/Video Recording Release & Consent form.

C. Use of Technology

1. Only cameras and recorders issued by the School Based Clinic Program via the SBC-DC may be used for recordings and pictures. The use of cell phones, personal cameras or other devices is prohibited.
2. Playback of video files 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.
3. At the end of use, all files on the memory card or audio tape will be erased. See *Procedure E-1: Tracking, Use and Transportation of Memory Cards & Audio Tapes with PHI Files.*
4. SBC cameras are shared clinic property. Thus, the camera must remain available to other SBC staff upon request.

D. Tracking and Use of Memory Cards

Recordings or pictures of mental health sessions are considered PHI. Therefore the handling and transportation of camera memory cards and audio tapes with such files should follow HIPAA Privacy rules. *See Policy A: HIPAA Privacy Rule*

1. Inventory Management of Memory Cards & Audio Tapes

a. Only memory cards and audio tapes issued by the School Based Clinic Program via the SBC-DC may be used for recordings and pictures. The use of personal cameras or other devices is prohibited.

b. Memory cards and audio tapes will be checked-out by the mental health provider via the Camera, Memory Card & Audio Tape Tracking form. See *Procedure E-1: Tracking, Use and Transportation of Memory Cards & Audio Tapes with PHI Files.*

c. Memory cards and audio tapes with PHI files will always remain locked-up when not in use in the chart file cabinet within the clinic.

d. After use, memory cards and audio tapes will be checked back in by the mental health provider.

2. Use of Memory Cards & Audio Tapes

a. Memory cards and audio tapes will only be used in cameras and recorders issued by the School Based Clinic Program via the SBC-DC. The use in cell phones, personal cameras or other devices is prohibited.

b. Memory cards with PHI files are to only be used within a school based clinic or MDHFS.

c. Audio tapes may only leave a school based clinic or MDHFS for practicum reasons. These tapes must not contain PHI.

d. 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).

3. Transportation of Memory Cards

a. Transportation of memory cards with PHI files from one clinic to another or to and from MDHFS must be placed in a red envelope and transported via the locked clinic courier bins. Memory cards with PHI files may not leave the clinic by any other means.

Approved

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