

Good morning!

Is your HCC planning a move this summer? As you're packing boxes and unplugging equipment, please be sure that your moving TO DO List also includes these steps, required by HIPAA and University policy:

1. Paper files - Boxes that contain PHI that are being moved must be secured at all times. They should not be left unattended in areas that unauthorized individuals have access to, such as hallways or loading docks.
2. Inventory – Do you know what PHI (paper, film, devices) you are moving? Having an inventory of what PHI is being moved is necessary to ensure that all PHI arrives at the new location.
3. Equipment – Equipment that contains PHI must be on your device inventory – be sure to update your inventory showing the new location (or ask your Tier 1 to update it) when you complete the move.
4. Storage – If you are using this move as a time to send old files to storage, be sure to document what is sent to storage. Use only University-approved storage locations.
5. Movers – If you are not using OU employees for the move to your new location, be sure Purchasing knows that you need Business Associate terms included with your moving services agreement.

For additional information, please see HIPAA FAQ, Item B, #9 Moving and Storing PHI.

<http://www.ouhsc.edu/hipaa/faqs/>, and

HIPAA Privacy Safeguards policy, Physical Safeguards, Paper Records,

<http://ouhsc.edu/hipaa/secured/default.asp?page=policies>, and OU IT Transportation of Electronic Media policy,

https://it.ouhsc.edu/policies/Transportation_of_Media_Policy.asp.

We hope these reminders help you have a smooth move. If you have any questions or concerns about moving PHI, please contact Jill Raines, HIPAA Privacy Official, (405)271-

2033; Mary Milano, HIPAA Compliance Auditor, (405)271-6674; or Marty Walton, (405) 271-2033. OU Physicians clinics may also contact Sally Duckett at x46947 or Michelle Goins 918-619-4117 for assistance.

Mary L. Milano, CHP, CSCS, CHPSE
HIPAA Compliance Auditor
University of Oklahoma
Health Sciences Center
Office of Compliance
405-271-6674 (office)
405-313-9783 (cell)
Anonymous Hot Line
405-271-2223
866-836-3150

Jill Bush Raines
Assistant General Counsel, Office of Legal Counsel
and University Privacy Official
The University of Oklahoma
1000 S.L. Young Blvd., Room 221
Oklahoma City, OK 73117
(405) 271-2033
(405) 271-1076 (fax)
jill-raines@ouhsc.edu

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