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Next Review 10/2024

**General Operating Policy: Newberg School-Based Health Center  
Release of Information**

**Purpose**

In partnership with Newberg School District, Providence will ensure that operational policies, standards, and procedures are made available to the staff that address the policy statements reflected in this policy to ensure that an individual's health information is properly protected while allowing the flow of health information needed to provide and promote high quality health care for the individual. The process for protecting patient confidentiality will include appropriate maintenance of paper and electronic records to follow state and federal statutes to the best of our ability. These practices include requirements stated in the Standards for Privacy of Individually Identifiable Health Information ("Privacy Rule") under the requirements of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH Act or "The Act").

**Policy**

**Information that is Protected**

Providence will protect all individually identifiable health information that it holds or transmits directly or through an authorized third party, in any form or media, whether electronic, paper, or oral including demographic data that relates to the individual's past, present, or future physical or mental health or condition, the provision of health care to the individual, or the past, present, or future payment for the provision of health care to the individual.

**Uses and Disclosures – General, Permitted and Authorized**

Providence will not use or disclose individually identifiable health information except either as the Privacy Rule permits or requires; or as the individual, who is the subject of the information (or the individual's personal representative), authorizes in writing. Where required, Providence will use and disclose individually identifiable information without an authorization in accordance with the Privacy Rule. Providence will obtain the written authorization of an individual for any

use or disclosure that is not for treatment, payment, or health care operations, in accordance with the Privacy Rule. Providence will not directly or indirectly receive remuneration, including non-financial benefits such as in-kind benefits, in exchange for individually identifiable health information that is considered Protected Health Information (PHI), unless an individual authorizes in writing, or an applicable exception applies.

#### Minimum Necessary

Providence will make reasonable efforts to use, disclose, and request only the minimum amount of individually identifiable health information that is needed to accomplish the intended purpose of the use, disclosure, or request. Providence will implement the appropriate internal safeguards to comply with the minimum necessary standard.

#### **Procedure**

##### On Site Record Maintenance

1. Upon first entering as a patient of Providence, the Consent to Treatment and other registration form will be reviewed and signed. An electronic medical record will be established for each patient.
2. Any paper record, if kept, will be filed alphabetically by last name, using date of birth as a confirmation of patient identity as needed, in a secure location.
3. All patient medical records (paper and electronic) and the information contained within shall be kept confidential in accordance with applicable federal and state statutes, including HIPPA, to the best of the clinic's abilities.
4. Paper records should be kept in a locked room and/or cabinet when staff is not present. Electronic records shall be kept on a secure database protected by password systems that are only accessible by SFC staff. All records are the property of Providence Medical Group.
5. All clinic staff shall be appropriately trained and educated regarding patient confidentiality and HIPPA and each person is responsible for maintaining security and confidentiality of these records, verbal and written.

##### Records Review

1. As patients are at clinic and seen by providers, the medical records are checked for general completeness by clinic staff and leadership.

2. Peer review of records will be completed quarterly to assure completeness of documentation within the record and assure quality.
3. The School-Based Health Center coordinator will have access to medical records and review as necessary to provide additional resources requested by the patient or parent/guardian.

#### Release of Information/Access to Records

1. Release of information contained in the patient's medical record requires written consent, which is filed in the patient record with the date records sent (and what records were sent) noted.
2. Any part of the record containing information about sexually transmitted diseases (with the exception of HIV status, which may not be released without separate, specific patient consent), mental health issues, contraceptive use, or drug or alcohol problems may be released to the parents of patients under the age of eighteen (18) only in accordance with ORS 109.610, ORS 109.640, and ORS 109.675, if the provider feels that it is in the best interest of the patient.
3. When Providence is requesting or releasing medical information, the Authorization for Release of Information form is to be completed by the patients. A copy of this form is filed in the patient's record after being faxed or mailed.
4. Release of medical records may be requested through the Providence Health Information Management Office with a signed authorization from the legally consenting party.
5. In the rare event that information must be shared without the completion a Release of Information Form (i.e. emergent disclosure of information to prevent patient harm), staff will follow the workflow to document a quick disclosure in the electronic medical record.

#### **Stakeholders**

Providence Oregon Medical Group – Access Strategies

Providence Behavioral Health Services

Newberg Public Schools

Oregon Health Authority, Oregon School Based Health Centers

Yamhill County Public Health

#### **List Cross-References**

PH&S Oregon Region, PROVIDENCE-RIS-850 General Privacy Policy (PolicyStat ID: 7919893)

Oregon Health Authority, Oregon School-Based Health Centers Standards for Certification,  
Version 4 (Oregon School-Based Health Centers)