

Augusta University

Policy Library

Student Medical Records Security and Confidentiality

Policy Manager: PO Department

POLICY STATEMENT

Augusta University complies with the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99), a federal law that protects the privacy of student education records. As a result, Student Health Services confidentially creates, acquires, updates, and maintains student health records in accordance with FERPA.

A student health record may originate in one of two ways:

- 1) when a student makes his/her first visit to Augusta University's Student Health clinic and thus, becomes a patient.
- 2) when a student submits health information related to health or immunization history.

It is the responsibility of Student Health Services to retain health records and to ensure security and confidentiality in accordance with FERPA requirements.

AFFECTED STAKEHOLDERS

Indicate all entities and persons within the Enterprise that are affected by this policy:

- Alumni Faculty Graduate Students Health Professional Students
 Staff Undergraduate Students Vendors/Contractors Visitors
 Other:

DEFINITIONS

FERPA The Family Educational Rights and Privacy Act of 1974 (FERPA or the Buckley Amendment) is a United States federal law that governs the access to educational information and records by public entities such as potential employers, publicly funded educational institutions, and foreign governments.

PROCESS & PROCEDURES

The health record is originated on the date of the student's first visit to Student Health Services or when a student submits health information related to health or immunization history. The student's record becomes a patient record when he/she is first seen at the Student Health clinic for any clinical reason (e.g., medical visit, lab testing, vaccines, TB testing, etc.).

All clinical information, including immunization data, is stored within the electronic health record. Non-electronic documents are scanned and incorporated into the electronic health record. All paper

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Next Review: 2/2024

student health records are returned to the locked health record room after use during patient encounters. All electronic information is backed up daily.

Only authorized personnel will be permitted access to Student Health Services computers. Access to computer files shall be controlled through security codes and passwords. Passwords will be changed frequently to ensure security. Previous passwords cannot be reused within the Student Health Services computer system. Users are restricted to log-ins only at certain workstations.

Access to and use of health information is restricted to authorized personnel with a need to know in the performance of their work at Student Health Services. Student workers employed for administrative support will not have access to any health records.

Health records will not be left visible or unattended in areas accessible by unauthorized individuals. Health information of a secondary means (indexes, hard-copy reports, or archived and deactivated records) shall be protected and secured in the same manner as the official health record. Computerized patient/provider care information shall be protected and secured in the same manner as the official paper health record.

Student Health Services retains health records on paper or in electronic format for ten years past the last visit. For minors, records are kept 10 years past the age of majority (18 years old for the State of Georgia). All records older than ten years are purged from the electronic system and from backup storage. A certificate of destruction is retained. Paper records are picked up by a data destruction company under contract with Student Health Services and a certificate of destruction is obtained from the company.

All losses, tampering, and unauthorized use of health information are reported to the Office of Compliance Ethics and Risk Management at AU. Resolution will involve thorough analysis and development and implementation of working solutions.

REFERENCES & SUPPORTING DOCUMENTS

- FERPA: <https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>
- Health Information Privacy: www.hhs.gov/ocr/privacy/index.html
- FERPA and HIPAA Guidance
https://studentprivacy.ed.gov/sites/default/files/resource_document/file/ferpa-hipaa-guidance.pdf

RELATED POLICIES

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APPROVED BY:

Executive Vice President for Academic Affairs and Provost, Augusta University

Date: 2/1/2021

President, Augusta University

Date: 2/1/2021