



CORRECTIONS MEDICINE
Confidentiality of Protected Health Information
ACA Standard: 4 ALDF 4D-13, 4D-14, 4D-19, 4D-27

Effective: January 1994

Revised: Aug 2001, July 3011, March 2015, Apr 2019, July 2019

Reviewed: March 2015, Apr 2016

Policy Number:
CM – 09

- I. **PURPOSE:** To assure all information related to the health care of the patient is protected.
- II. **POLICY:** All protected health information for patients of the Corrections Medicine program are maintained and kept confidential by the Saint Louis Department of Public Health (DPH) in accordance with local, state, and federal laws.
- III. **DEFINITIONS:**
 - **EMR** – Electronic Medical Record
 - **HIPPA** - Health Insurance Portability and Accountability Act
- IV. **RESPONSIBILITY:** All Corrections Medicine staff are responsible for the content of this policy and procedure as well as adherence to the policy.
- V. **PROCEDURE:**
 1. Corrections Medicine staff serve to care for patients and act as their advocates in health matters. Health care is rendered with consideration for the patients’ dignity and beliefs.
 2. Confidentiality of the EMR is maintained at all times with access granted only to DPH staff who maintains EMR access. The EMR can only be accessed by DPH staff members who possess a valid password.
 3. The EMR is routinely archived to maintain integrity of active and inactive information of each person registered in the EMR system. Records retention is in accordance with local, state, and federal laws.
 4. All medical encounters including medical and mental health interviews will be conducted in a setting that respects the patient’s privacy. [REDACTED]
[REDACTED] (see Department of Justice Services Policy 833). Female patients are provided a female escort for encounters with a male health care provider, if requested.
 5. Only health information necessary to preserve the health and safety of a patient, other patients, volunteers, visitors, or the correctional staff, or health information to make operational decisions is shared with the director or superintendent of DJS.

Portions of this record are closed pursuant to Section 610.021(19) RSMo and Section 114.020(18) SLCRO because public disclosure of such portions would threaten public safety by compromising the safe and secure operation of the Jail, and the public interest in nondisclosure outweighs the public interest in disclosure of the portions of such records.

6. Information will be supplied to the appropriate DJS staff for potential medical problems which could result in the requirement of an immediate response from DJS staff members as it relates to housing, program placement, security, and transport. These include, but may not be limited to:
 - a. Diabetes
 - b. Epilepsy
 - c. Psychosis
 - d. Suicidal ideations
 - e. Physical limitations
 - f. Patients on medication with potential side effects
 - g. Patients withdrawing from alcohol or drugs who require closer observation
7. Written authorization by the patient is necessary for the release of health record information unless otherwise provided by law or administrative regulation having the force and effect of law.
8. All DPH Corrections Medicine Staff are required to annually complete HIPPA training.
9. If the appropriateness or necessity to share protected health information is unclear, the Saint Louis County Counselor's Office shall be consulted for legal advice surrounding HIPPA protections.

VI. **REFERENCES:**

American Correction Association; Performance-Based Standards for Adult Local Detention Facilities; Fourth Edition; Standard ALDF-4D-13; Standard ALDF-4D-14 and Standard ALDF-4D-19

National Commission on Correctional Health; Jail Standards, 2018; Standard J-A-08 and Standard J-A-09