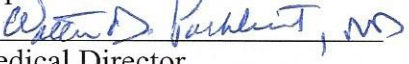


Index Section:	Human Resources (HR 5.1.2)	Effective:
Policy:	HR. 5.1.2 Employee Access to Personal Health Records	Replaces or Modifies: 5/01/14 version
	Primary Responsibility: Site Managers, Privacy Officer, Director of Human Resources	Approved: 8/10/2017  Medical Director

POLICY: Galen maintains protected health information ("PHI") in either paper or electronic format on each patient treated at one of its facilities. Standards of privacy and access for every Galen employee with respect to (a) his or her own medical information, and (b) the PHI of legal dependents and other Galen patients for whom the employee may have assumed personal responsibility, are the same standards of privacy and access guaranteed to every other Galen patient; provided, however, the specific employee medical information is not already separately maintained by Galen for compliance with applicable employment and safety laws and regulation. Neither the HIPAA Privacy Rule nor the Security Rule covers employee medical information maintained for employment and safety purposes.

PURPOSE:

Galen maintains the privacy of employee PHI and provides each employee appropriate access to his or her own PHI in the same manner as other Galen patients. In order to maintain medical record documentation standards and documentation integrity, however, Galen prohibits unnecessary or inappropriate access by employees to their personal medical records through any of Galen's internal clinical information systems. Employees may only use Galen's internal clinical information systems to access medical information, including PHI, as their job may require, and then subject to all restrictions imposed by law or other Galen policies.

PROCEDURE:

A. Employees who are patients of Galen are entitled to access their own PHI only as provided in Patient Privacy Policy 3.6, "Access of Individual to Protected Health Information." Employees may make written requests or may access their personal medical information through Galen's online patient portal. An employee may not for any reason use his or her work-related access through any internal information system to view his or her own health information.

B. Employees who serve as "Personal Representatives" of other Galen patients are entitled to access those health records only in accordance with Uses and Disclosures of Protected Health Information Requiring Personal Representatives (PtP 2.6). Under no circumstances may an employee access the PHI of his/her spouse, partner, child, family member or friend by any means if that employee lacks necessary authority from that person, and then only if the employee is certain that the employee's access is not prohibited by law or other Galen policies, in particular Uses and Disclosures of PHI to Minors Through Web Portal (PtP 2.8).

C. If during the ordinary course of performing the duties of his or her job, (1) an employee believes that he or she should access the PHI of his/her spouse, partner, child, family member or friend, and (2) the employee believes such access is not prohibited by law or other Galen policies, then (3) the employee must nonetheless seek prior authorization from a supervisor or physician caring for that patient.

D. As with any medical record, each employee is strictly prohibited from deleting, altering, or amending their own medical record, or the medical records of a spouse, partner, child, family member or friend, through Galen's internal information systems. Employees, as with other Galen patients, are entitled to request an amendment to such records in accordance with Patient Privacy Policy 3.2, "Patient Right to Amend Patient Health Information."

E. All Galen systems and electronic medical records are subject to continuous audit to detect inappropriate access.

F. Inappropriate or unauthorized access by an employee (1) to his or her own medical information and/or (2) to the PHI of legal dependents or other Galen patients for whom the employee may have assumed personal responsibility, will result in corrective action up to and including termination.