

HIPAA PRIMER SERIES

Iron Mountain Records Management Services**HIPAA-COMPLIANT SOLUTIONS
THAT KEEP YOU COMPLIANT**

Contents

- 3 Physical Records: The Ongoing Compliance Challenge
- 5 Working with an Outside Vendor: The Advantages of a Compliant Records Management Partner
- 7 Iron Mountain Records Management Services: Solutions You Can Trust
- 13 HIPAA Compliance and Beyond
- 17 Conclusion

Maintaining paper patient records in a compliant manner remains a major challenge for most healthcare providers. This inherently difficult task is complicated by multiple departments, thousands of patients, and the dueling requirements of easy access and HIPAA-level security.

That's why many leading healthcare organizations rely on Iron Mountain. Our experience, proven workflows, and best practices make us the trusted partner for all aspects of records management, while meeting or exceeding HIPAA requirements.

With Iron Mountain as your records management partner, you can be comfortable knowing your patient information is protected and safe – for the life of your records.

HIPAA privacy regulations have been significantly tightened. Now, not only are you required to be compliant, but your third-party partners must be compliant as well.

PHYSICAL RECORDS

THE ONGOING COMPLIANCE CHALLENGE

With all the attention paid to electronic health records, it's important to remember the huge number of physical records – paper and film – that are still being used in healthcare, and will be for years to come.

These physical records must be stored, accessed, and moved throughout their lifecycle in compliance with HIPAA privacy regulations, which were significantly tightened under the American Recovery and Reinvestment Act of 2009 (ARRA). What's more, the new HIPAA rules not only require your hospital or practice to be compliant, but your third-party partners must be compliant as well.

Keeping track of every record throughout its lifecycle, and ensuring its protection is a daunting challenge. Iron Mountain is the proven, HIPAA-compliant partner that can help you do it.

WHAT THE LAW REQUIRES

The HIPAA Privacy Rule requires establishing and implementing measures to ensure the confidentiality, integrity, and availability of all Protected Health Information (PHI).

Who Must Comply. Health plans, healthcare clearinghouses, healthcare providers (also known as "Covered Entities"), and business associates to whom they provide health information.

What It Covers. PHI includes any information about health condition, treatment, or payment for care that can be related to an individual. The term is a broad one and generally includes all information contained in a patient's medical record and payment history.

What the Penalties Are. The government has ramped up enforcement and penalties related to the protection of patient information. Penalties can reach a maximum of \$1.5 million annually per type of violation. On the enforcement side, state attorneys general, in addition to the Department of Health and Human Services (HHS), have been given authority to prosecute HIPAA violations. In the future, we can expect the following:

1. Any civil monetary penalties recovered by HHS will be used for their future enforcement efforts.
2. Individuals harmed by a violation may receive a percentage of the penalties, thus encouraging both patients and authorities to report violations.

Working with a HIPAA compliant third-party partner provides the resources and highly-trained personnel necessary to manage your records efficiently, cost-effectively, and in accordance with the ever-evolving regulatory requirements.

WORKING WITH AN OUTSIDE RECORDS MANAGEMENT VENDOR

ADVANTAGES OF A COMPLIANT RECORDS MANAGEMENT PARTNER

Most healthcare providers choose one or more outside vendors to help manage their patient records. Outsourcing has several advantages. It allows your organization to focus on its core mission. It offloads the burden of maintaining the space and managing the records to a specialist who has the systems and personnel in place to handle the job efficiently and cost-effectively. And, a records management partner can provide the offsite facilities and physical protection necessary to deliver truly compliant storage and management of PHI.

CONSOLIDATING MAKES SENSE – ONLY IF YOUR PARTNER IS HIPAA COMPLIANT

To get the maximum benefit of working with a third-party partner, many leading healthcare organizations are consolidating to a single vendor they can partner with for a comprehensive records management solution.

This strategy makes sense. Consolidation eliminates unnecessary vendor expenses, promotes the consistent application of workflow processes, and strengthens the chain of custody associated with records management. However, it is essential that the partner you choose be able to deliver the full range of records management services you will need. What's more, under the new regulations, you must obtain satisfactory assurances that your partner is HIPAA compliant, both in the services they provide to you and in their own internal operations.

Only then will you have the records management help you need – and the peace of mind that comes from working with a trusted HIPAA-compliant partner.

Iron Mountain provides a proven, comprehensive solution for compliant records management that can be tailored to fit your institution's particular needs. Our services are built on best-practice workflows, ensuring your information is accessible when you need it, yet fully secure and compliant throughout every record's lifecycle.

IRON MOUNTAIN RECORDS MANAGEMENT SERVICES

SOLUTIONS YOU CAN TRUST

Iron Mountain provides a highly proven, comprehensive solution for compliant records management tailored to fit your institution's particular needs. We manage your records offsite in one of our highly secure record centers, using consistent, auditable workflows and advanced security systems. Our best-practice processes improve access to patient information, strengthen chain of custody and increase regulatory compliance.

Iron Mountain Records Management Services offer:

- **Information Management Expertise.** The knowledge gained from years of experience, thousands of customers, and millions of records in our care.
- **Checks and Balances.** A proven methodology with multiple checks to ensure records are securely handled and stored.
- **InControl® for Security During Transit.** An advanced transportation security platform for ensuring the protection of your records at all stages of transit.
- **Highly Secure Facilities.** Storage facilities uniquely equipped with technologically advanced alarms and sensors, advanced fire protection, and 24/7/365 monitoring to protect your records.
- **Ongoing Performance Measurement.** Continuous improvement driven by regular monitoring of key performance metrics of our processes and facilities.

Very simply, we take care of your information as if it were our own. It's one more reason why Iron Mountain is the choice for managing and protecting your records.



INCONTROL: FOR SECURITY IN TRANSIT

Security is especially critical when records are in transit. That's why Iron Mountain developed InControl, an advanced transportation security platform that ensures the protection of information in transit in three key ways:

Prevention. Our vehicles are outfitted with innovations in security technology, such as dual-key ignition, driver proximity alarms, high-security, key-locking mechanism, and door-ajar ignition prevention.

Early Detection and Correction. We utilize real-time wireless scanning technology to validate pickup and delivery transactions and to maintain chain of custody. By utilizing wireless communication protocols, we can identify and reconcile inventory discrepancies in real time, at the point of origination.

Proof. As information is routed through our delivery platform, Iron Mountain's InControl technology keeps a real-time audit trail to document each transaction. You have the ability to designate authorized contacts for receiving and sending records. For further accountability, InControl keeps a delivery audit trail with electronic signatures and automated email service confirmation receipts for orders placed via Iron Mountain Connect™, your online records management Web portal.

60 Years of Experience

Iron Mountain Records Management Services are built upon workflows that have been developed, refined and proven for 60 years. These workflows are the key to making patient information accessible when you need it, yet fully secure and compliant throughout every record's lifetime.

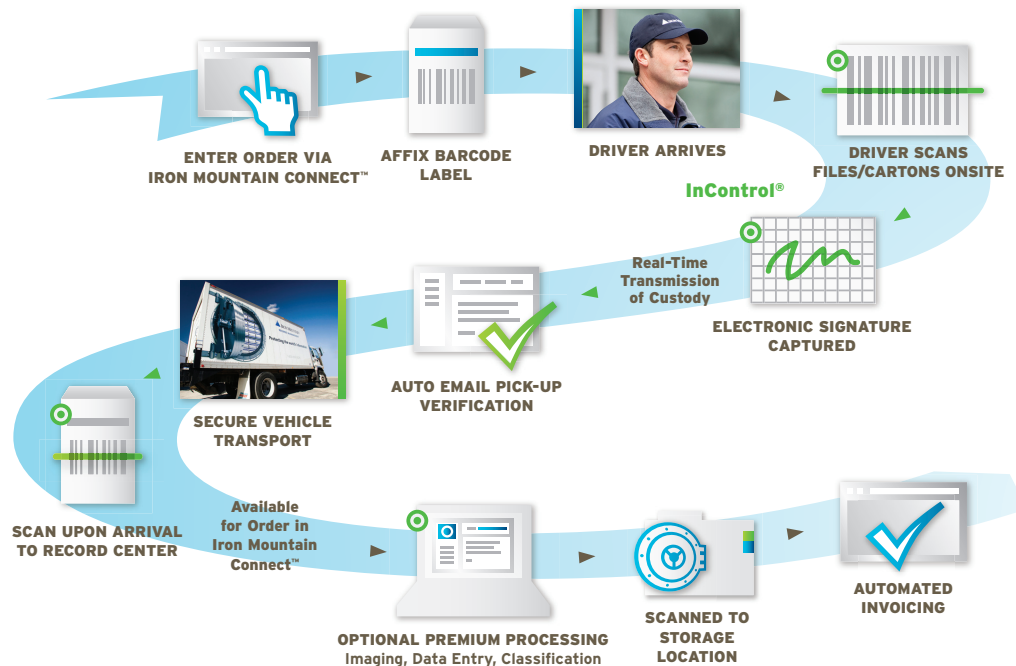
INCOMING

Our incoming workflow keeps your records protected, from the moment we arrive to pick up your materials to their storage in our highly secure facilities. As a best practice, your records are individually indexed for improved access and management over time. This

enables us to confirm the receipt of each patient record and provides you with a comprehensive, file-level inventory of your records at any time.

- **Triple-Check Workflow.** Files are scanned at every location and validated against previous scans to ensure accuracy, security, and chain of custody.
- **Data Entry Validation.** New files are labeled with descriptive information for tracking and later retrieval. This information can be keyed by us or by you online into Iron Mountain Connect.
- **Opaque File Transport Bags and Bins.** We provide you access to opaque file transport bags and bins in which records can be sealed to conceal and further protect PHI while in transit.

RECORDS MANAGEMENT WORKFLOW | INCOMING



SCAN POINTS & REAL-TIME TRANSMISSION OF CUSTODY

RETRIEVAL

Iron Mountain makes retrieval simple, fast and secure. Using Iron Mountain Connect, you can search and retrieve records using your own descriptive data, and schedule delivery times – all online.

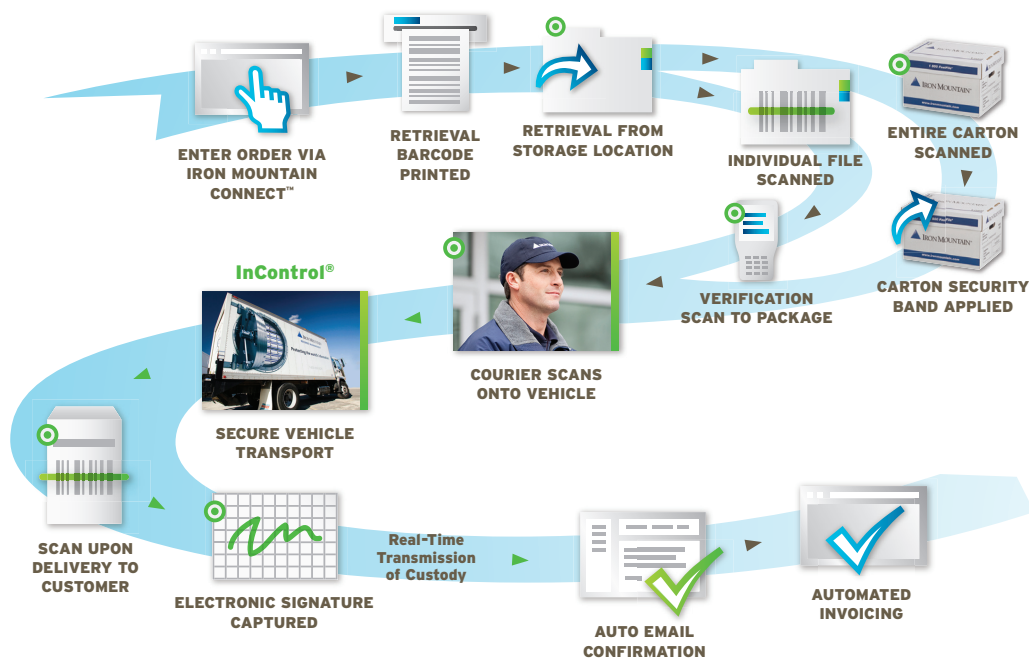
- **Retrieval Label Double Scan.** All files pulled for retrieval are tagged with an additional retrieval label, and both labels are scanned to ensure that only the correct files are actually retrieved.
- **Opaque Wrapping.** We use opaque wrapping to mask PHI when transporting medical records. This best practice ensures your information remains confidential throughout the outbounding process.
- **Carton Banding.** We band each carton before transport, for extra protection.
- **Vehicle Validation.** Files are scanned during loading, so the right files are on the right vehicle for optimum delivery security and compliance.

- **Validation at Customer Site.** As part of the InControl process, drivers complete retrieval by scanning each file at your location.

EFFICIENTLY MANAGE YOUR RECORDS WITH IRON MOUNTAIN CONNECT

Iron Mountain Records Management Services include access to Iron Mountain Connect, a Web-based inventory management system that provides your staff the tools necessary to transform your records management program into an enterprise-wide compliance program. The system provides complete visibility and control of your records and allows you to rapidly search your inventory to locate records. Authorized users can easily request records, run inventory reports, define retention policies, and monitor destruction programs.

RECORDS MANAGEMENT WORKFLOW | RETRIEVAL



SECURE DESTRUCTION

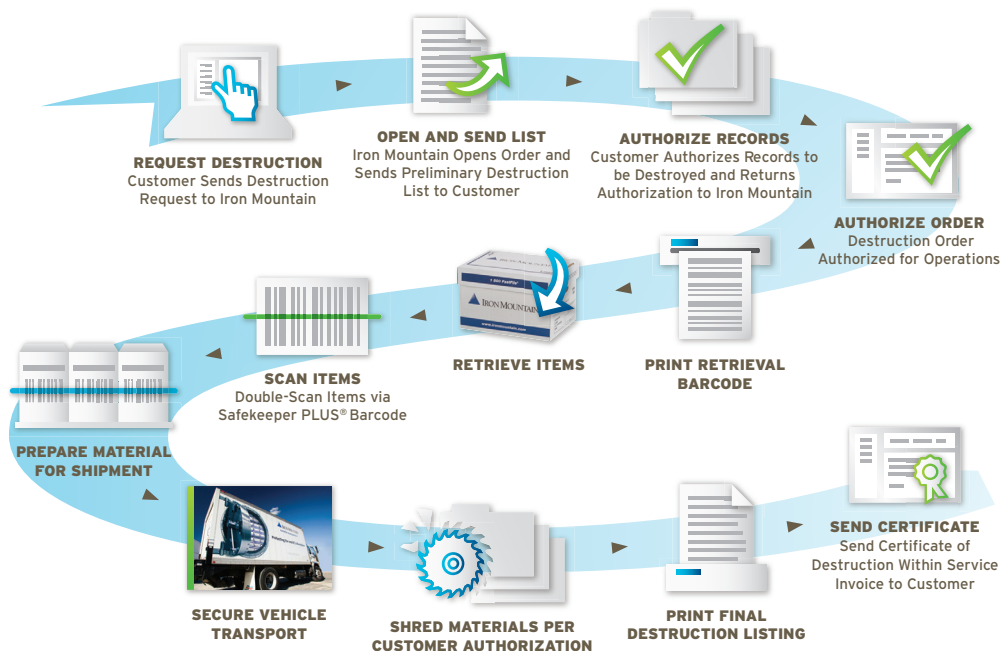
Essential to any cost-effective and compliant records management program is the rigorous and timely enforcement of retention and destruction policies. Iron Mountain helps you meet these requirements through our Secure Shredding Services. Together our Records Management and Secure Shredding Services can help you monitor the destruction eligibility of your archived records and ensure the permanent destruction of sensitive patient information at the end of its lifecycle.

- **Automated Destruction Eligibility Reporting.** We help you systematically manage the lifecycle of your inventory based on your personal retention schedule. Using Iron Mountain Connect, you can define retention policies and access key information related to your records inventory, including destruction eligibility reports.
- **Auditable Chain of Custody.** InControl captures an auditable chain of custody using a reliable barcode ID scanning process.

- **Secure Destruction Checks and Balances.** Multiple checks and balances ensure only the right items are destroyed. Destruction only proceeds after careful review and authorization by you as well as by Iron Mountain. Every item scheduled for destruction is scanned and marked with special tags to ensure accuracy. Once permanently shredded, we provide you with a certificate of destruction for verification.
- **Reliable Shred Process.** Records approved for destruction are completely destroyed and then all paper-based materials are recycled to ensure your information is nonrecoverable.

In addition to destroying your archived files, Iron Mountain also helps you meet compliance requirements for those documents requiring immediate shredding. We can help you design a cost-effective destruction program, leveraging our onsite or offsite shredding service options to meet your specific requirements.

RECORDS MANAGEMENT WORKFLOW | ARCHIVAL DESTRUCTION



With Iron Mountain you can be confident your records are managed in a compliant manner, by a company that is itself HIPAA compliant. We constantly upgrade our processes to meet evolving regulatory requirements and best practices, ensuring our solutions are consistent, current and highly secure.

IRON MOUNTAIN RECORDS MANAGEMENT SERVICES

HIPAA COMPLIANCE AND BEYOND

Iron Mountain has been committed to meeting HIPAA privacy regulations since the law was first enacted in 1996.

We combine a deep understanding of the HIPAA rules with our own experience at leading healthcare institutions to provide a compliant records management solution. In fact, our best-practice approach to handling patient information often exceeds HIPAA requirements. We use stringent protocols and procedures to address the same requirements every healthcare provider must follow, making us an ideal enterprise partner for healthcare providers.

With Iron Mountain, you can feel confident the management of your records is HIPAA compliant and that you are working with a HIPAA-compliant business partner.

KEY REQUIREMENTS OF THE HIPAA PRIVACY RULE

The HIPAA Privacy Rule was established to protect patient information from being used or disclosed inappropriately or without the patient's permission. To ensure this, the rule requires Covered Entities to develop administrative and physical safeguards regarding the use, disclosure, access, release, and destruction of PHI.

Administrative safeguards require you to document procedures for operational processes such as workflows, employee training, reporting, and auditing. Physical safeguards cover controls such as locks, limited access to keys, and security systems.

RECORDS MANAGEMENT COMPLIANCE CHECKLIST

HIPAA regulations now require your business associates, as well as your own institution, to be compliant.

Iron Mountain maintains the following policies and procedures to promote compliance.

ADMINISTRATIVE SAFEGUARDS

- ☑ Auditable chain of custody for the handling of all records at all times
- ☑ Standardized workflows to ensure best practices
- ☑ Indexing/MPI cleanup for better tracking
- ☑ Employee screening and background checks
- ☑ Employee training for the appropriate handling of PHI
- ☑ Documented processes to mitigate risk
- ☑ Multiple scans/signatures when information is shipped
- ☑ Web software to help you manage and track records-related activities

Administrative Safeguards

HIPAA requires documented procedures for operational processes, such as training, workflow, and the release of information, be put in place to ensure information is always handled according to policy. Iron Mountain meets this requirement, and helps you meet it, in several ways.

Access and Use. Iron Mountain utilizes strict procedures to ensure our employees access PHI only when necessary and according to the duties required to support you. We carefully monitor access privileges and limit employee access using badges, 24/7/365 surveillance, and other security measures. Also, your institution can use Iron Mountain Connect to help you limit and track your employee access.

Privacy Policies and Procedures. Iron Mountain has developed protocols and procedures covering the same activities every healthcare provider must follow, including dedicated security resources, mandatory safety and security policies, regular audits, and effective employee training and management oversight. We also strictly monitor access to our buildings and maintain a highly secure chain of custody for PHI under our care.

Release of Information. Iron Mountain maintains best-practice procedures for every phase of the release of information process. We use a formal chain of custody process to ensure all records are properly handled. In fact, patient files stored at our record centers do not have to leave our facilities for release processing. We ensure that each release of information request and authorization includes the required elements to be HIPAA compliant, and our stringent performance standards require every release of information associate to adhere to our privacy and confidentiality standards.

Workforce Training and Management. Iron Mountain boasts an exceptional screening and training program for our employees, from records management specialists and IT staff to those who drive our vehicles. For positions that handle PHI, such as release of information associates, we provide even more detailed HIPAA training. We also perform regular reviews of work to ensure employee actions comply with state and federal regulations. Our screening and training policies include:

- Comprehensive background checks and drug screening prior to hire for all employees.
- Regular training on security policies and procedures for all employees.
- Mandatory Code of Ethics training, enforcing appropriate information access and handling procedures, for all employees.
- Special safety and security screening for our destruction specialists and equipment operators.

Mitigation. In order to achieve and maintain compliance, you must evaluate the security and compliance of your records management program on a regular basis. Iron Mountain has a team dedicated to monitoring HIPAA requirements and evaluating our compliance. This team proactively tracks changes to industry regulations and works with Iron Mountain's operations personnel on an ongoing basis to improve processes, mitigate risks, and ensure continued compliance.

Audit Trail. The ability to audit activities is an essential component of any HIPAA-compliant records management program. As a best practice Iron Mountain individually indexes your records. This enables us to confirm receipt of each patient record and provide a comprehensive approach to tracking your documents throughout their lifecycle. This information can be used both for reporting and for continuous improvement initiatives.

We also help you generate an audit trail in several ways:

- Detailed security procedures and reporting to manage authorized access, using such tools as unique employee identification, monitoring of facilities access, and barcode scanning of records whenever handled or moved.
- Complete chain-of-custody audit trail for records in our possession, throughout the life of each record.
- Web-based software which allows you to directly manage and track records-related activities.
- Detailed accounting of all release-of-information disclosures, including who received the request, why, and the action taken.
- A certificate of destruction to verify your information is securely shredded and nonrecoverable.

Compliant Destruction. The proper, permanent destruction of all physical PHI in accordance with retention policy requirements is necessary to reduce the risk of a security breach and maintain compliance. Our Secure Shredding Services offer you access to a suite of tools designed to help you monitor the destruction eligibility of your records and consistently enforce your retention policies. We provide a full range of reporting and auditing of document destruction to help increase compliance with HIPAA and other regulatory requirements.

INDEXING: IMPROVE ACCESS TO PATIENT INFORMATION AND INCREASE HIPAA COMPLIANCE

Patients' lives depend on our ability to find critical information about their medical history in a timely fashion, which is why we individually list your medical records. During the inbound process a primary file identifier, most commonly the record number or patient's name, is captured. We also recommend the capture of at least two additional file identifiers such as last date of service, date of birth, or episode of care. This HIPAA-compliant best practice enables you to efficiently track and manage your record inventory, and ensures your patient information remains easily identifiable and readily accessible

RECORDS MANAGEMENT COMPLIANCE CHECKLIST

PHYSICAL SAFEGUARDS

- Carton strapping of packages for extra protection
- High-security vehicles for transporting records
- High-security storage facilities with guards, monitoring, and fire-suppression systems
- Fully-compliant destruction with multiple sign-offs and an auditable chain of custody
- Opaque wrapping of all records to conceal PHI during transport

Physical Safeguards

HIPAA requires you and your partners to have physical controls, such as locks, limited access to keys, and supervision to protect records containing PHI from unauthorized physical access.

FACILITY STANDARDS

Iron Mountain adheres to our Principles of Global Facility Protection, which mandate some of the industry's most advanced systems to safeguard your information both inside and outside our buildings, far exceeding the requirements of HIPAA. Our Principles of Global Facility Protection include:

- Alarms and intrusion detection systems to detect, alert and record conditions.
- Access control systems at exterior and customer material storage area entrances.
- Utilization of licensed, authorized, third-party uniformed security personnel to bolster security.
- Advanced detection and automatic fire-suppression systems.
- Central monitoring of protection systems 24/7/365.
- Use of third-party auditors to ensure compliance with security standards through unannounced, random audits.
- Internal compliance audits for facilities.
- Annually tested and updated continuity plan for all facilities.
- Facilities, racking and shelving configurations compliant with local and federal codes.

TRANSPORTATION STANDARDS

To ensure the protection of information in transit, Iron Mountain utilizes secure vehicles equipped with dual-key ignition, driver proximity alarms, high-security key-locking mechanism, and door-ajar ignition prevention. We seal medical records in opaque wrapping and band cartons prior to transport. Throughout the process, real-time wireless scanning technology is used to capture electronic signatures and maintain an auditable chain of custody. Our advanced vehicle security, vehicle process controls, and auditable workflows provide a foundational defense against potential information loss and prevent common transportation-related errors.



Beyond Compliance

HIPAA requires that your partners be HIPAA compliant. To further mitigate risk, however, Iron Mountain goes beyond compliance. We employ best practices that we have developed and deployed at leading hospitals and other healthcare institutions around the country. This best-practice approach ensures that all reasonable measures are taken to protect patient information, to remain in good standing with the law and the public, and to promote a positive and responsible image in the community.

CONCLUSION

Even as healthcare organizations transition to electronic health records, you will continue to use physical records for years to come. Maintaining HIPAA compliance for the lifetime of all records, in the face of tightening regulations, is a difficult challenge.

With Iron Mountain Records Management Services, you get a solution that is proven in many of the leading healthcare institutions across the country. You can be confident your records are managed in a compliant manner, by a company that is itself HIPAA compliant. Furthermore, we constantly upgrade our processes to meet evolving regulatory requirements and best practices, ensuring our solution will remain compliant, now and into the future.

To learn more about our HIPAA-compliant Records Management solutions [contact us today at 1-800-899-IRON](tel:1-800-899-IRON).

THE HIPAA PRIMER

HIPAA PRIMER SERIES

Our HIPAA Primer Series offers you in-depth insights into the proven best practice policies and procedures Iron Mountain employs to ensure that our solutions not only meet but exceed HIPAA requirements.

To learn more about how a specific solution can help you ensure your information remains highly secure yet readily accessible throughout its lifecycle, check out our other best practice guides from this series, including:

IRON MOUNTAIN CLOUD STORAGE SOLUTIONS

HIPAA-Compliant Solutions for Health Information Challenges

IRON MOUNTAIN DATA PROTECTION SERVICES

Proven, Trusted and HIPAA-Compliant Media Management

IRON MOUNTAIN DOCUMENT CONVERSION SERVICES

The HIPAA-Compliant Approach to EMR Transition

IRON MOUNTAIN RECORDS MANAGEMENT SERVICES

HIPAA-Compliant Solutions That Keep *You* Compliant

IRON MOUNTAIN RELEASE OF INFORMATION SERVICES

Coming Soon



ABOUT IRON MOUNTAIN. Iron Mountain Incorporated (NYSE: IRM) provides information management services that help organizations lower the costs, risks and inefficiencies of managing their physical and digital data. Founded in 1951, Iron Mountain manages billions of information assets, including backup and archival data, electronic records, document imaging, business records, secure shredding, and more, for organizations around the world. Visit the company Web site at www.ironmountain.com for more information.

© 2011 Iron Mountain Incorporated. All rights reserved. Iron Mountain, the design of the mountain and InControl are registered trademarks and Iron Mountain Connect is a trademark of Iron Mountain Incorporated in the U.S. and other countries. All other trademarks and registered trademarks are property of their respective owners.