

**DAI Policy 500.50.09 – Disclosure of Protected Health Information (PHI) With Inmate Patient
Authorization and Court Orders
Attachment E – Redacting Instructions
Effective Date: 08/25/14**

When a DOC employee processing a request for information determines that one or more of the documents to be reviewed and/or copied includes information NOT legally authorized for copying, viewing or copying, employee shall follow these instructions to redact the information not authorized for disclosure.

The same redacting instructions apply for removing inmate patient's Social Security numbers (SSN) from documents received by the DOC. The Social Security Administration release form (SSA-827), always includes the SSN. After the request has been processed, DOC has no reason to retain the SSN in its records. Other documents that may include SSNs are cover letters and authorization forms received from attorneys and community health providers.

- Identify each document that has been copied to respond to the request that includes PHI not authorized for disclosure under a signed Authorization, court order, or statutory exception.
- Identify each document received by the DOC that includes an inmate patient's SSN.
- **On the copy**, use a black permanent marker, liquid white-out or white-out tape to cover-up (redact) the PHI not authorized for disclosure. (Remember to never alter the original document in this manner.)
 - Make a copy of the redacted document; i.e., the document on which a marker, liquid white-out, or white-out tape has been applied.
 - Shred the above-described copy of the document on which redactions were made.
 - Do **not** forward the document on which the liquid white-out or white-out tape has been applied.
 - Do **not** forward the document on which the black marker has been directly applied for the first time because the words can generally be read when the document is carefully scrutinized or held up to a light.
- Review the copy of the redacted document to determine if the PHI can be read. Sometimes when a black marker is used, words/numbers can be read on the first copy of the redacted document when held up to a light source.
 - Continue to blacken the PHI on subsequent copies until non-authorized PHI cannot be read on the copy to be forwarded to the requester. Note: Due to the increased sensitivity of the Multi-Function Devices, this has become a more frequent problem.
 - Shred all copies that will not be forwarded to the requester.
- Attach the POC-52 to the document, or set of documents, that have been redacted.