



Title/Subject: Location and Handling of Student Health Records

Applies to: faculty students staff Other - Click or tap here to enter text.

Policy System Process/Procedure Guideline/Standard Position Description

- **Introduction**

- **Historical/Contextual Overview:** The College of Medicine requires that each student provide certain childhood and adult immunizations before the start of medical school. The school also requires certain immunizations and proofs of immunity in accordance with the Center for Disease Control’s recommendation for Health Care Workers. Immunization records are considered protected health information (“PHI”) and the providers collecting and maintaining this data are “covered entities” both subject to the protections and requirements of the HIPAA privacy rule. Student immunization records are considered “educational records” and are protected under FERPA because they are (1) directly related to a student; (2) maintained by an educational institution or a party acting for the agency or institution; and (3) not excluded from the definition as treatment or sole possession records, or on some other basis. 20 U.S.C. § 1232g (a) (4) (a). Therefore, individual student immunization records are considered education records under FERPA and are not subject to the HIPAA privacy rule. Accordingly, HIPAA neither authorizes nor permits the disclosure of these records.

- **Reason for the Policy:** To ensure that medical student records are maintained in accordance with legal requirements for security, privacy, confidentiality, and accessibility.

LCME Standard 12.5: Non-Involvement of Providers of Student Health Services in Student Assessment/Location of Student Health Records - The health professionals who provide health services, including psychiatric/psychological counseling, to a medical student have no involvement in the academic assessment or promotion of the medical student receiving those services. A medical school ensures that medical student health records are maintained in accordance with legal requirements for security, privacy, confidentiality, and accessibility.

- **Scope:** This policy applies to all College of Medicine students, including visiting students.

- **Policy Statement:**

The college will not maintain any health records on any students, with the exception of immunization records.

All immunization records will be stored in either a physically secured location with limited personnel access, or electronically in a secure electronic form.

The College of Medicine will designate a primary person and a back up to be the sole personnel who have access to the students’ immunization records. These personnel are prohibited from having contact with students in any form that would entail a connection to the evaluation, advancement, or promotion of the student.

Authority: Office of Medical Education

Policy/Process POC: Office of Student Affairs

Effective Date: 9-13-19

Review/Revision Schedule: Annual Review

Indexed as: health records, immunizations, FERPA



Said personnel will be the conduit through which all students upload and request immunization records.

Personnel will have access to a medical director to answer any questions related to immunizations; however, the medical director must not be involved in the evaluation, advancement, or promotion of the student.

● **Procedures:**

- Upon school matriculation, all students will create an account in Compolio, a cloud-based compliance tracking system. This system will provide students with life-time access to their uploaded immunizations and vaccinations.
- Visiting students selected for TAMHSC COM electives or JAMP Summer Internships will be required to provide immunization records to the Program Manager in the Office of Medical Education.
- For students visiting from other locations, records will be reviewed by the Program Manager within the Visiting Student Application Service (VSAS) system. These records will be uploaded directly to the online database by the visiting student. No visiting student health records will be downloaded or maintained by TAMHSC College of Medicine.

● **Disclosure of Information:**

- The College of Medicine will not disclose or release any of the information within the Student health record without consent UNLESS:
 - It is in connection with a health or safety emergency [to] appropriate persons if the knowledge of such information is necessary to protect the health or safety of the student or other person(s). An example of this would be if a student is noncompliant with COM immunization requirements, the Campus Dean and/or Clerkship Coordinator will be notified of this delinquency so that the student is encouraged to take action immediately in order to lessen the risk of disease contraction and spread.

- **Compliance:** It is the shared responsibility of all to assure that the specifications of this policy are followed. All violations will be investigated and reported immediately the TAMHSC Risk Compliance Officer and Privacy Officer. Anyone who knows or has reason to believe that another person has violated this procedure should report the matter promptly to his or her supervisor or the Privacy Officer.

- **Revision History:** *(Include date of origination in the chart below. Do not delete any revision history. Previous versions of the policy/process should be saved in COM Policies and Procedures Team Drive in Google)*

Date of Change	Authority	Summary of Changes	Document Location
May 23, 2019	Office of Medical Education	creation of formal policy	COM Policies and Procedures Team Drive in Google

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