

<p style="text-align: center;"><b>The University of Texas SOUTHWESTERN MEDICAL CENTER At Dallas</b></p>	<p style="text-align: center;"><b>Privacy Compliance Program Privacy Manual</b> Section 7: Standard Protocols for Uses, Disclosures and Requests of PHI Policy No: 7.19 Last Revised: April 11, 2003 Effective Date: April 14, 2003</p>
<p><b>Transcription Services</b></p>	

**POLICY:**

UT Southwestern may use and disclose PHI for purposes of conducting or retaining transcription services for PHI in accordance with this standard protocol.

**PROCEDURE:**

1. Authority.
  - a. UT Southwestern Workforce may use PHI to conduct medical transcription activities without the Individual’s authorization as part of UT Southwestern’s health care operations.
  - b. UT Southwestern may disclose PHI to contracted medical transcription service providers without the Individual’s authorization provided there exists a business associate agreement pursuant to Section 9 of this Manual, which sets forth the policy and procedure for Business Associates.
  
2. Minimum Necessary Rule.
  - a. Generally. When using or disclosing PHI for transcription services, UT Southwestern Workforce shall use or disclose only the minimum PHI necessary to perform the service.
  - b. Entire Medical Record. The circumstances in which an entire medical record would be required to be provided for transcription services are extremely rare. There may be situations where disclosure of the entire medical record shall be necessary for transcription services, but these disclosures must have a documented justification.
  
3. Specific Protocols
  - a. Workforce transcription providers. UT Southwestern will impose appropriate administrative, physical and technical safeguards to limit the access that Workforce transcription providers are given to both paper and electronic medical records in accordance with Paragraph 2 of this Policy.
  - b. Contracted transcription providers. UT Southwestern will use, and will require its contracted transcription providers to use, appropriate administrative, physical, and technical safeguards when transmitting PHI to contracted transcription providers,

in accordance with the Information Security Policies and Procedures. Contracted transcription providers must sign Business Associate Agreements through the Office of Contracts Management.

4. Verification. UT Southwestern Workforce will obtain verification of the recipient of a PHI disclosure for transcriptions services, in accordance with Section 6.5 of this Manual, which sets forth the policy and procedure for Verification For PHI Disclosures.

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**LEGAL REFERENCES:**

45 C.F.R. § 164.514(d)(3)(i) (2001)

65 Fed. Reg. 82462, 82545, 82621 (Dec. 28, 2000)