Purpose:
This policy is to inform the student radiographer that images that are used from the clinical agencies must have all PHI removed and used only for educational purposes in an assignment in the program.

Policy:

The IU South Bend Radiography Program requires that any radiographic image(s) taken from a hospital setting must follow the policy of the National Institutes of Health (NIH) and have all personal health information (PHI) removed. The images can only be used for educational purposes in a required assignment.

According to the NIH, de-identified health information is not considered PHI or subject to the HIPAA Privacy Rule. Therefore, in the absence of PHI a release form is not required. The student should not be de-identifying images. This should be done by their Clinical Instructor (CI) or another clinical site employee using the Safe Harbor method § 164.514(b)(2) at a minimum. This ensures that PHI is being protected and removed correctly. It also ensures that students are not removing images from their sites without first discussing it with their CIs.

The following steps should be used when obtaining images for educational purposes:

1. Contact the PACS/office or Clinical Instructor and have the images placed on a CD, ensuring all PHI is removed. The CD should then be opened by the PACS/office or Clinical Instructor to ensure the images do not have any PHI.

2. The images will be used within the assignment only.

3. Images need to be deleted from devices once they are uploaded in the assignment.

4. The CD will be brought to campus and destroyed by a shredder.

5. For the assignment, PHI of any kind cannot be disclosed.

Failure to comply with this policy can result in possible demerits and/or dismissal from the program.