

Procedures for Protecting Sensitive Information

- **Sensitive information should be locked up when not in use.** For sensitive information that is in use, be sure to conceal under a cover sheet or in a folder to help protect from others viewing the information.
- **New client accounts--**The person who signs the New Client form for financial responsibility is the person whose identification is to be examined and whose information should match what is written on the New Client form. After requesting and examining the identification of the new client, initial the form.
- **Patient records storage--**Since there are currently no drawer covers or locks on the filing cabinets, the files are not to be left unattended during business hours and the clinic will continue to be locked after-hours.
- **Patient records faxed--**Patient records are limited to the owner and co-owner listed on the account as well as other veterinary clinics, including veterinary specialists, and boarding facilities who have a need to know the pet's history information. Before faxing patient records to approved persons/facilities, either print out or make a copy of the requested pet history information and cross out the client's address, phone number and account number. The person requesting the pet's history information (whether over the phone or by fax) must be able to provide the client's first/last name and pet's name.
- **Care Credit applications--**Be sure to examine identifying documents as requested for the application. Once the application is input online or by phone, give it to the Practice Manager to store in a locked closet. (Send home in a sealed envelope.) Per Care Credit, the completed Care Credit applications are to be retained in a locked storage for 4 years in the event there is a question or discrepancy.
- **Home Again microchip pet registrations--**Once the microchip registration is input online or by phone, give it to the Practice Manager to store in a locked closet. (Send home in a sealed envelope.) Home Again does not have a retention requirement but recommends we keep the completed registrations on file for 1 year in the event of a discrepancy.
- **Credit card numbers (current payments)--**Do not store credit card or Care Credit numbers on any computer, including IntraVet. In addition, do not email or ask a client to email or transmit in any electronic form their full credit card or Care Credit number. Also, do not keep hand-written credit card or Care Credit numbers on file, but request this information only when needed.
- **Credit card numbers (hold payments)--**Do not store credit card numbers on any computer, including IntraVet. In addition, do not email or ask a client to email or transmit in any electronic form their full credit card number. Manually swipe the client's credit card on the manual swipe machine (not credit card terminal), write in the processing dates and have the client sign the manual credit card slip. Keep credit card numbers locked in the cash box until needed to process hold payment(s). In the "Comments" section of the Payment Plan form, write that there is a

credit card on file and include only the last 4 digits of the client's credit card on file for reference. Once the final credit card hold payment has been processed, send the manual credit card slip to the Practice Manager in the daily deposit envelope, and staple the Payment Plan form to the back of the patient record in case there is a question about a charge. The Practice Manager will retain the manual credit card slip for up to 3 years in the event of a discrepancy.

- **Credit card client and batch receipts**--Continue to give client credit card and batch receipts to the Practice Manager for retention in the event of a discrepancy.
- **Check hold payments**--Keep hold checks locked in the cash box until needed to process the hold payment(s). Once all hold check payments have been processed, staple the Payment Plan form to the back of the patient record in case there is a question about a deposited check.
- **Keep outgoing mail behind the desk and not on the counter.**
- **Shred documents** that contain client/pet, employee or clinic information (i.e. name, address, phone number, financial information, identification numbers, pet history, etc.)
- **Computer passwords**--Each computer workstation will be set to require a password after 15 minutes of inactivity. This password will be changed on a quarterly or more frequent basis.
- **Computer protection**--The clinic will continue to use firewall/anti-virus/anti-spyware protection to help protect the computers from outside sources. To this end, it is imperative all staff, volunteers, visitors, etc. not visit unknown websites.