**BHRD Procedure for Making a CD Containing PHI**

1. Discuss with the Privacy Officer whether the disclosure of data to be written to the CD is appropriate based on the privacy and confidentiality P&Ps and other laws and regulations.
2. Contact the KCIT LAN staff (or other assigned IS person) to encrypt the file(s).
3. Ask the KCIT LAN staff to prepare the label. Supply the title for the name of the file for the disk. Disk shall be labeled with the name of the file(s) and BHRD information as defined in the Confidentiality and Security P&P.
4. Prepare a log form (Section 16, Attachment A, Appendix 10) to document the preparation and disclosure of the PHI. Give this to the Privacy Officer. If multiple clients shall be included on the data disk, only one log form should be prepared. The log should list the name of the file and the location of the file that specifies which clients are included. The privacy officer shall file the log form in the confidential client data files.
5. The transfer of the data CD from BHRD to the new owner shall be documented with a signature at the time of the transfer. Obtain a signature from the person who comes to pick up the CD or who receives the CD when it is brought in-person to the receiver. The signature should be affixed to a copy of the letter of delivery of the data, or to a statement saying what data is contained on the CD being delivered.
6. If the CD is to be sent by courier such as FedEx or the US Post Office, arrange for the delivery to be made with “signature required” described in the Privacy Policy Section 16 Attachment A, 5.13.3 Delivery Services.