CURECAST
CLINICAL PHOTO MANAGEMENT

iPhone Patient Photo Security Checklist for Clinics

- [ ] Choose one clinical photo app, and sign its BAA (Business Associate Agreement) before you upload the first photo.
- [ ] Write a rule that the iPhone's Camera app must not be used for patient photos.
- [ ] On every phone, turn on a passcode, Stolen Device Protection and Find My iPhone.
- [ ] Turn on Erase Data on clinic iPhones.
- [ ] Write a rule that patient photos must never be sent by AirDrop.
- [ ] Give each person their own login for the clinical photo app.
- [ ] Once a month, look in the Photos app and the Recently Deleted album on clinic iPhones. Check that no patient photos are there.
- [ ] When a person leaves, remove their access to the clinical photo app.
- [ ] Train your team, and keep a record that you did (45 CFR 164.308(a)(5)).

Source: CureCast
https://dr.curecasthealth.com/blog/hipaa-compliant-photos-iphone/

You are free to share or adapt this checklist for your own clinic rules. If you post it online, please add a link back to the source above. This checklist is general information about HIPAA and clinical photography. It is not legal advice, and state privacy and retention requirements vary. Check your own policies with your compliance lead or counsel.