CURECAST

Patient Photo Safety Checklist for Clinics

You don't have to fix everything in a day. Work from the top down, because the order matters: deleting a photo before it's safely stored elsewhere can wipe out part of a patient's record.

- [ ] **Find out where photos are today.** Ask everyone who takes patient photos what's on their phone and where it syncs. Ask kindly and without blame, so people answer honestly. Check galleries, cloud accounts and messaging apps.
- [ ] **Turn off automatic cloud sync** on any gallery that still holds patient photos, so no more copies leave your control while you fix the rest.
- [ ] **Make sure a BAA is in place** with every vendor that stores or handles patient photos, before any photo moves to them. A BAA (business associate agreement) is a contract where the vendor promises to protect patient information (45 CFR 164.308(b)).
- [ ] **Set up a safe way to capture.** Use a clinical photo app that gives each person a login and keeps an access log. If the team keeps photographing the old way, new photos land in the same place tomorrow.
- [ ] **Move existing photos into that system,** attaching each one to the right patient record.
- [ ] **Then clear out the old copies.** That means the gallery, the cloud account, the “Recently Deleted” folder, shared albums and old backups. Check that each deletion actually went through.
- [ ] **Lock down every device that touches PHI** (protected health information, such as patient photos and records). Require a passcode, make sure encryption is on, and set up remote wipe.
- [ ] **Write a short photo policy.** Cover who can take photos, where they're stored, how they're shared, and what to do if a phone goes missing.
- [ ] **Train your team** (45 CFR 164.308(a)(5)), and keep a record that you did.
- [ ] **Add photo removal to your offboarding checklist** (45 CFR 164.308(a)(3)(ii)(C)), so patient images don't walk out the door with departing staff.
- [ ] **Review it once a year,** and whenever staff or devices change. Your annual security risk analysis (45 CFR 164.308(a)(1)(ii)(A)) is a natural time to do it.

Consent is a separate question from storage. Get the patient's consent before taking clinical photos if your state or clinic policy requires it, and get a separate written authorization before you use an identifiable photo in marketing (45 CFR 164.508(a)(3)).

Source: CureCast
https://dr.curecasthealth.com/blog/phone-gallery-hipaa-compliant/

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.