



City and County of San Francisco  
Edwin M. Lee, Mayor

## San Francisco Department of Public Health Office of Compliance and Privacy Affairs

DPH Business Ethics and Best Practices  
November 12, 2015

### Before considering cloud-based shared drives, please read this:

Cloud-based file sharing is quickly gaining in popularity and our office has received a number of requests for sharing files with protected health information between treatment providers and agencies.



While vendors may boast of its security, the Department of Public Health has reviewed the security and record management issues related to cloud-based shared drives (e.g., OneDrive, BaseCamp and DropBox...to name a few) and established the following guidelines:

1. While DPH Information Technology explores secure alternatives to cloud-based shared drives, and until further notice, **DPH employees should NOT store PHI on cloud-based shared drives.**
2. **Prior to storing paper or electronic documents separately from a patient's medical record, staff must obtain approval in writing from their area Medical Director.** Supervisors should contact their privacy officer or medical records supervisor for consultation to assure that access, control, maintenance and sharing of this PHI meets DPH standards before storing PHI separate from the medical record.
3. If storage outside of the medical record is approved by the area Medical Director, **it is allowable to create an access-controlled shared folder on a DPH Server that is inside the DPH firewall.**
4. Access requires individuals to have Active Directory accounts. Individuals outside the DPH will require approved remote access to be setup. **Contact the DPH IT Help Desk (415-759-3577) for assistance in setting up a shared folder.**

**Please hold your patients' health information as precious as you hold their health. It's important.**

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Calls may be made confidentially and anonymously – Always remember: SFDPH has a non-retaliation policy