



DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS UNITED STATES AIR FORCE

MEMORANDUM FOR AFMOA/SGZC

FROM: AFMSA/SGSLE

SUBJECT: Labeling Digital Imaging Removable Media

1. The move from the “wet-film” to digital imaging in the Air Force Medical Service (AFMS) is providing new and efficient ways for providing healthcare to our beneficiaries. As changes, such as digital imagery, are implemented in the AFMS, we need to remain vigilant in the way we manage patient information and ensure compliance with Federal/State Laws, and DOD/Air Force Instructions. More specifically, Healthcare Insurance Portability and Accountability Act (HIPAA) mandates that we ensure the reasonable protection of protected healthcare information (PHI). Compliance with PHI rules and regulations is at the heart of this memorandum as the move from “filmless” to digital environment, at least for the interim, will require proper labeling of both the printed films and electronic media (Disk, CD, DVD, Tapes, etc.) used to store images. Failure to properly label all types of media can not only result in thousands of dollars in HIPAA fines, but conceivably in the death of patients.

2. Request that you review the current practices used in your facility to manage the custody and labeling of removable media (Atch 1); specifically digital imaging media that contains PHI. (Removable media should be immediately labeled by the person writing to the media.) At a minimum, all removable media shall be labeled with the following (Atch 2):

- a. Information Classification: *Sensitive, Privacy Act*
- b. Information Owner/Source: *Responsible Medical Group*
- c. Patient Identification: *Last Name, First Name, Last 4 of SSN*
- d. Return Instructions: *Responsible Medical Group Address, Phone #*

3. The purpose of this memorandum is not to replace existing guidance, but to serve as a reminder that each MTF is responsible for due care and diligence in the consistent application of proper labeling of media containing PHI. Thank you for your attention to this issue and if you have any questions, please contact myself (DSN 343-4120) or Mr. Tom Lewis (DSN 343-4034).

ERICH P. MURRELL, Maj, USAF, MSC, FACHE, CISSP  
Chief, Medical Technology Sustainment and Support

Attachments:

1. Digital Imaging Removable Media Workflow
2. Sample CD/DVD Label

1<sup>st</sup> Ind, AFMOA/SGZC

MEMORANDUM FOR SEE DISTRIBUTION

I concur. The issue of protecting the privacy and healthcare information of our beneficiaries must not be compromised. Request all departments review, update, and/or implement appropriate policies to ensure digital images are labeled, stored, released in an appropriate manner.

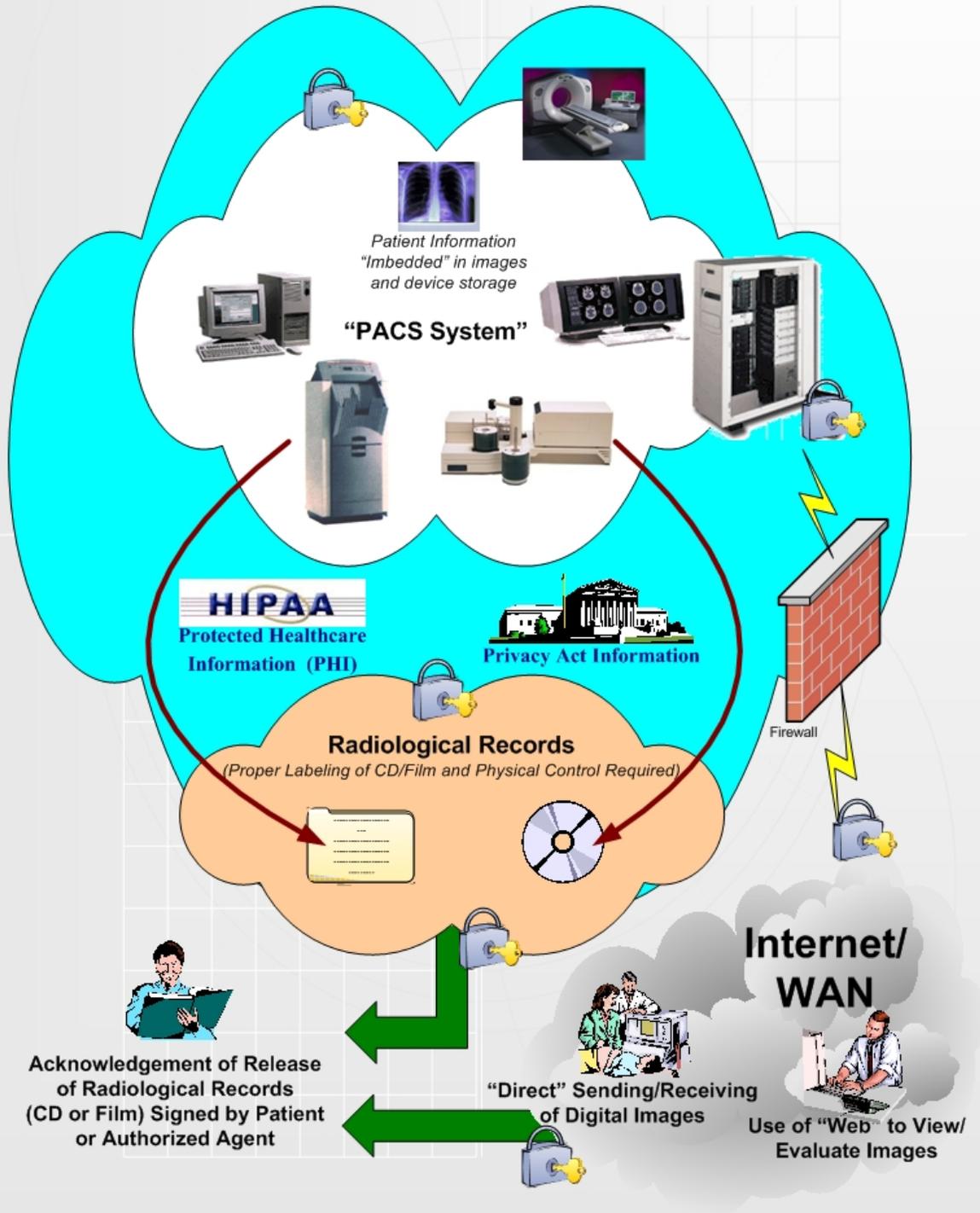
Timothy G. Sanders, Col, USAF, MC  
Consultant to the USAF Surgeon General  
for Radiology Services

DISTRIBUTION:

AFMS Medical Treatment Facilities w/Digital Imaging Capabilities

# Radiological Image Management

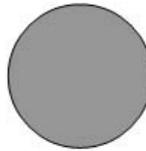
*Follow same procedures for CD/DVD as Film*



## Example: CD Labeling

**Patient Name**  
**Last 4 of SSN**

**Property of United States Air Force**  
**Privacy Act of 1974 as Amended Applies**  
**“Protected Healthcare Information”**



**If found, please return to:**  
**Facility**  
**Facility Address**  
**Facility Phone Number**

*Information contained on this  
media is intended only for use  
by authorized healthcare  
technicians and providers.*