National Fire and Aviation Executive Board

Memorandum

To: **Fire Management**

From: **National Fire and Aviation Executive Board**

Date: **June 20, 2007**

Subject: **Handling of Medical Records Created on Incidents**

This memo is to provide direction and policy regarding the proper handling of Patient Evaluation (PE) and treatment records (NFES Form 1672 or equivalent, emergency room or medical provider documentation, ambulance transport/treatment forms, etc.) created on emergency incidents.

The following actions will take place on emergency incidents:

1. Incident host units will provide guidance to the Incident Management Team at the in-briefing that PE and treatment records for incident support personnel treated at the incident will be identified as such and secured at all times. During working hours, the area in which the records are maintained or regularly used shall be occupied by authorized personnel or access to the records shall be restricted by their storage in locked metal file cabinets or locked room.

2. The Incident Management Team, Medical Unit personnel, will give the original PE documentation to the employee. The term "employee" in this case applies to all incident personnel, including contractors, volunteers, and cooperators. For organized crew evaluations, give the treatment documentation to the crew supervisor or liaison in a sealed envelope.

3. Documentation of patient evaluations performed by the Medical Unit should be accomplished with a treatment log, thus reducing the risk of compromising sensitive patient information. The treatment log should not contain any sensitive personal information.

4. Upon demobilization of the incident, the Medical Unit log should be given to the incident host unit. The treatment log can also be used by the incident host unit to provide statistical documentation of patient evaluations and to support any medical provider payments.

5. Direction and policy for compensation for injury and illness documentation (CA Forms) is addressed in the Interagency Incident Business Management Handbook. In some cases, incident personnel who are treated at the Medical Unit have also completed CA documentation with the Finance Section. In those instances, the original PE forms should be attached to the original CA forms maintained by the Finance Section. Any original CA documentation should also be given to the employee or their crew supervisor upon release from the incident.

Any employee, volunteer, contractor or cooperator who is treated for a medical condition or sustains a personal injury while assigned to a Federal incident, should retrieve the original documentation of that treatment or injury before leaving the incident. This documentation is crucial to any future medical treatment that may be necessary as a result of that condition or injury. Employees should give these original documents to their servicing human resources office. Contract employees should give these documents to their employer.

6. While serving on non-federal incidents, any federal employee, volunteer or contractor who receives medical treatment or sustains a personal injury should request a copy of the PE and any other injury or treatment records. Upon return to their duty station or point of hire, employees should complete any additional forms required by their agency or employer.

7. Incident personal injury and patient evaluation documentation does not come under the purview of the Health Insurance Portability and Accountability Act (HIPAA).

Incident support personnel must exercise due diligence in protecting these records. While personally identifiable information; i.e., social security number, home address, home phone number, date of birth, etc. is required for documentation on the CA forms, it is not necessary to include that information on PE forms, even if the form has a line or box that requests that information.

Marc Rounsaville
USDA-Forest Service
Fire and Aviation Management
Deputy Director

Timothy M. Murphy
Bureau of Land Management
Fire and Aviation
Deputy Assistant Director (NIFC)

for Lyle Carlile
Bureau of Indian Affairs
Fire Director

Brian McManus
U. S. Fish and Wildlife Service
Fire Director

Mike Wallace
National Park Service
Fire Director

FOR Dan Smith
National Association of State Foresters
Fire Director