

Advice on storing patient identity documentation

To	Primary Health Organisations
From	Michael Howard, Acting Manager, Primary Care, Commissioning
Subject	Advice on storing patient eligibility and identity documentation as part of the patient enrolment process
Date	22 August 2023

What is this about?

This is updated advice for Primary Health Organisations (PHOs) and general practice teams on storing patient identity documentation which is asked for as part of the enrolment process. This advice does not vary any of the existing contractual processes within the national PHO Services Agreement and is presented as guidance only.

Why is identity information checked and stored?

As per the [Enrolment Requirements for Contracted Providers and Primary Health Organisations](#)¹ (Enrolment Requirements), general practice teams need to establish they have checked that a person seeking to enrol is eligible for publicly funded health services.

General practice teams may ask new patients or those with a time-limited eligibility status² to provide documentation (eg, a passport) to assess their eligibility.

We have recently confirmed that general practices do not need to store a copy of this for audit purposes. General practice teams can choose to store this on file as a record of the person's eligibility if they wish. If they do, they must comply with the [Privacy Act 2020](#)³ and the [Health Information Privacy Code](#)⁴. The [Office of the Privacy Commissioner website](#)⁵ provides guidance and factsheets on the health information collected, used, held, and disclosed by health agencies.

What is the updated advice for auditing purposes?

General practice teams should record a note of the details they reviewed to confirm eligibility to enrol. This could be either in the practice management system or on the enrolment form itself. This note should include:

- The evidence confirming eligibility for publicly funded treatment has been sighted by an employee of the practice. General practice teams are able to rely on what's shown to them by the enrolling person, as long as it's a valid document listed in the Enrolment Requirements.

¹ <https://www.tewhatauora.govt.nz/assets/For-the-health-sector/Primary-care/Referenced-documents/Enrolment-Requirements-for-Contracted-Providers-and-PHOs-Version-4.1.pdf>

² For example, current work visa holders, Commonwealth Scholarship holders, those on the NZ Aid Programme or Foreign Language Teaching Assistantship Scheme.

³ <https://www.legislation.govt.nz/act/public/2020/0031/latest/LMS23223.html>

⁴ <https://www.privacy.org.nz/assets/New-order/Privacy-Act-2020/Codes-of-practice/Health-information-privacy-code-2020/HIPC-Amendment-No-1/Consolidated-Code-incorporating-Amendment-No-1.pdf>

⁵ <https://www.privacy.org.nz/privacy-act-2020/codes-of-practice/hipc2020/>

Refer to Appendix 1, on page 18 of the Enrolment Requirements and the [PHO Enrolment Checklist Summary Information for Office Staff](#)⁶.

- The record needs to include the following information:
 - The type of documentation provided (eg, passport or work visa)
 - Last 4 digits of the document relied on to prove eligibility (if applicable)
 - The date the document is valid until.

Examples:

“Person provided NZ passport, expiry date 01/01/2024, last 4 digits PP number...2365 – NZ citizen”

“Person provided work visa dated 01/01/2022, expiring 02/03/2024 – meets 2-year work visa criteria”

“Person provided student visa 01/01/2019 – 01/01/2023 followed by work visa 02/01/2023 – 02/01/2024 – meets 2-year work visa criteria”.

This information (but not a copy of the document itself) is also essential to support “documented evidence of eligibility” as part of the ‘auditable contact’ re-enrolment process (Section 8, Enrolment Requirements).

Why is this updated advice being sent now?

Te Whatu Ora recently received a query on this matter from a general practice and we explored the opportunity to provide updated advice on the storing of patient identity documentation to PHOs and general practice teams.

This advice may assist PHOs and general practice teams in minimising privacy risks while ensuring that they meet the requirements outlined in the Enrolment Requirements and the expectations of the Te Whatu Ora Health Payments Integrity (Audit) team.

Notes

- This advice supplements the requirements outlined in the Enrolment Requirements.
- These expectations are designed to meet the requirements of the Privacy Act 2020 and audit expectations of reasonable evidence retained to establish adequate eligibility checking has occurred.

⁶ <https://www.tewhatauora.govt.nz/our-health-system/eligibility-for-publicly-funded-health-services/resources-for-service-providers-to-check-eligibility/eligibility-checklists-and-decision-trees/>