

# HACKETTSTOWN REGIONAL MEDICAL CENTER

## Administrative Policy & Procedure

### Accounting of Disclosures

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<b>Effective Date:</b>	<b>April 2003</b>	<b>Policy No:</b>	<b>HIPAA-01</b>
<b>Cross Referenced:</b>		<b>Origin:</b>	<b>HIPAA</b>
<b>Reviewed Date:</b>	<b>10/08, 6/12</b>	<b>Authority:</b>	<b>Care Management</b>
<b>Revised Date:</b>		<b>Page:</b>	<b>1 of 1</b>

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#### **PURPOSE:**

To outline a formal mechanism for documenting and maintaining and suspending an accounting of when patients' protected health information has been disclosed for purposes other than treatment, payment or health care operations.

#### **POLICY:**

Hackettstown Regional Medical Center (HRMC) has a process by which an individual may obtain an accounting of instances when their PHI has been disclosed. HRMC will maintain an accounting of disclosures for at least six (6) years. The accounting can be requested through Medical Records. HRMC has up to 60 days to respond to the request.

- The accounting procedure excludes uses or disclosures:
  - To carry out treatment, payment and health care operations
  - For the facility's directory or to persons involved in the individual's care or other notification purposes
  - For national security or intelligence purposes
  - To correctional institutions or law enforcement officials
  - That occurred prior to the compliance date for HRMC
  - In which patient signs authorization

#### **PROCEDURE:**

1. A formal request to receive a list of PHI disclosures will be presented to HRMC Medical Records Department by the requestor.
2. Medical Records will record the request and advise the requestor that they will be contacted when the list is complete.
3. HRMC has 60 days to respond to the request.
4. Using the Patients Medical Record, a list of disclosures will be documented in writing to include the date, name and address of recipient, what was disclosed, and the purpose of the disclosure.
5. HRMC will contact the requestor to inform them as to the completion of their request.