

Advanced Heart and Vascular Center			
Policies and Procedures			
Policy Code: IM.001		Accounting of PHI Disclosures	
Approved By: Sandra Germany, Administrator	Effective Date: 06/18	Review Date: 5/26	Revision Date:

PURPOSE

To safeguard the confidentiality of protected health information (“PHI”).

POLICY

Advanced Heart and Vascular Center (“AHVC”) will be responsible for maintaining and tracking the accounting for all disclosures of protected health information, except those instances as documented in the medical record where PHI is released by the clinical staff for continuity of care. The following instances will be documented but do not require specific authorization from the patient:

- To the Department of Health and Human Services for compliance investigation;
- For public health activities including disclosures for the purpose of preventing or controlling disease;
- About victims of abuse, neglect, or domestic violence to the appropriate authority;
- Health oversight;
- For judicial and administrative proceedings;
- For law enforcement purposes as required by law;
- About decedents;
- For purpose of organ donation;
- For certain research purposes;
- To avert serious threat to health or safety;
- For specialized government functions; and

- For workers compensation.

DEFINITIONS

Custodian Of Medical Records – The custodian of medical records is the person responsible for ensuring that the patient medical record is complete, accurate, verifiable, accessible and structured appropriately in a timely manner to meet the needs of the patients, healthcare facility, and other regulatory agencies.

PROCEDURE

- AHVC shall document the following for all disclosures:
 - Type of Requester – (i.e., attorney, physician, hospital);
 - Date Needed;
 - Requestor Information (enter all fields for accurate accounting);
 - Medical Record # of patient;
 - Enter in the information sent to the requestor; and
 - Any comments (i.e., date sent, reason the information was sent etc.)
- When a request is received by a patient for an accounting of disclosures the document will be prepared and reviewed by the Administrator before it is released to the patient. The Custodian of Medical Records will review the document for accuracy and completeness.

REFERENCES

45 CFR 164.512