

# University Physicians Inc.



## ACCOUNTING OF DISCLOSURES POLICY

**Latest Revision:**

**Original Effective Date: April 4, 2003**

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**Purpose** To provide a standard procedure for accounting of all disclosures of patients protected health information in accordance with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Regulations.

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**Policy** As provisioned by 45 CFR 164.528 of the Health Insurance Portability and Accountability Act of 1996, an individual has the right to receive an accounting of disclosures of Protected Health Information (PHI) made by University Physicians, Inc. in the 6-year period preceding the date on which the accounting is requested, except for disclosures:

- To carry out treatment, payment, or health care operations
- Made to the individual
- For national security or intelligence purposes
- To correctional institutions or law enforcement officials having lawful custody of an individual
- Meeting requirements of a Limited Dataset
- That occurred prior to April 14, 2003

UPI will maintain an accounting of disclosures of Patient's Health Information where applicable (see above). This accounting will be in the form of a "Disclosure of PHI Log" within the Privacy Office.

UPI will provide one free accounting per 12-month period. For each additional request by a patient within that period, a reasonable cost based fee may apply. UPI's Privacy Officer will review all requests for disclosure and provide an accounting of disclosures to the patient within sixty-days (60) from the date of the request.

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**Procedure**

Create and maintain a **DISCLOSURE OF PHI LOG**. When possible, the log will contain a brief summary of the purpose for disclosure so that the patient will be reasonably informed.

Ensure that there is a copy of an individual’s authorization or a formal IRB authorization corresponding to each line item with the log sheet.

If a patient requests an Accounting of Disclosures, a report will be provided no later than sixty-days (60) after receipt of the request. If it is not feasible to meet the sixty-day deadline, UPI may extend the deadline by no more than thirty-days by informing the individual in writing, within the standard sixty-day period, of the reason for the delay. This deadline may be extended once per accounting.

Patients will be required to complete a **REQUEST FOR ACCOUNTING OF DISCLOSURES FORM** for each accounting request. Requests need to be handled by the UPI Privacy Officer or Management designee.

Each accounting made to patients will be tracked on the Disclosure of PHI Log by indicating the date of the accounting.

The organization will provide one free accounting per twelve-month period. For each additional request by a patient within that period, a reasonable cost-based fee may be assessed.

**Definitions**

See glossary for key terms and acronyms used in this policy.  
(On file with Privacy Officer)

**Enforcement**

Enforcement of this policy will reside with the Privacy Officer or appropriate Management.

**Rationale/  
Source**

- This policy complies with requirements of the Health Insurance Portability and Accountability Act (HIPAA), Privacy Rule

**Cross  
References**

For additional information, refer to the following:

Document Name
REQUEST FOR ACCOUNTING OF DISCLOSURES FORM (Available from Privacy Officer)
DISCLOSURE OF PHI LOG (On file with Privacy Officer)

**Review or  
Revision Date**

This policy is reviewed and approved annually, and as revised.

MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY

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**Governance**

Responsibility for adoption and/or implementation of this policy is as follows:

<b>Approving Body</b>		<b>Executive Approval</b>	
<b>Privacy Officer:</b>	<b>04/04/03</b>	<b>Chief Operating Officer:</b>	<b>04/04/03</b>
<b>Signature on file.</b>	<b>Date</b>	<b>Signature on file.</b>	<b>Date</b>