

University Physicians Inc.



VERIFICATION OF INDIVIDUALS POLICY

Latest Revision:

Original Effective Date: April 4, 2003

Purpose

The purpose of this policy is to outline an appropriate verification process when disclosing PHI to another individual.

Policy

Before disclosing PHI to another individual, employees must make reasonable attempts to verify the identity and authority of any individual requesting PHI. It is the responsibility of the employee who is about to make the PHI disclosure to obtain any documentation, statements, or representations, whether oral or written, from the person requesting the PHI when such documentation, statement, or representation is required by HIPAA policies.

Procedure

If disclosure is conditioned

If a disclosure of PHI is conditioned by HIPAA or UPI HIPAA policy on the receipt of particular documentation, statements, or representations from the person requesting the PHI, the person who is about to make the disclosure must receive the appropriate documentation, statement, or representation.

Identity of public officials

The person making the disclosure may reasonably rely on any of the following to verify identity when the disclosure of PHI is to a public official or a person acting on behalf of the public official:

- (1) Presentation of an agency identification badge, other official credentials, or other proof of government status;
- (2) Appropriate government letterhead on which the request is written; or,
- (3) A written statement on appropriate government letterhead that the person is acting under the government’s authority or other evidence or documentation that establishes that the person is acting on behalf of the public official.

Authority of public officials

The person making the disclosure may reasonably rely on any of the following to verify authority when the disclosure of PHI is to a public official or a person acting on behalf of the public official:

- (1) A written statement of the legal authority under which the PHI is requested; or,
- (2) If a written statement is impracticable, an oral statement of legal authority. If an oral statement is presented the person who receives the statement should what was said.

Exercise of professional judgment

Professional judgment should be exercised at all times.

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 following:
Health Insurance Portability and Accountability Act (HIPAA), Privacy Rule

**Cross
References**

For additional information, refer to the following:

Document Name

**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

Governance

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

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