



**Vice President and Chief Executive Officer of the Medical Center**

**MEDICAL CENTER POLICY NO. 0256**

A. SUBJECT: Accounting of Disclosures of Protected Health Information

B. EFFECTIVE DATE: July 1, 2013 (R)

C. POLICY:

The University of Virginia Medical Center respects the right of the patient to receive an accounting of disclosures of his/her protected health information for up to six years prior to the date of the request, except for disclosures:

1. To carry out treatment, payment, and healthcare operations;
2. Made to the patient or authorized by the patient;
3. Of inpatient hospital location information to clergy and the general public;
4. To persons involved in the individual's care;
5. For national security or intelligence purposes as authorized by the National Security Act;
6. To correctional institutions or law enforcement regarding patients in custody;
7. To law enforcement for permitted disclosures, when a law enforcement official requests a suspension of the patient's accounting rights for a specified time period;
8. To governmental regulatory agencies for investigations and surveys when the agency requests suspension of the patient's accounting rights for a specified time period;
9. Of a "limited data set" as defined in 45 CFR 514(e)"

D. PROCEDURES:

1. Responsibility  
Health Information Services is responsible for receiving and processing patient requests for an accounting of disclosures.
2. Process
  - a. In most instances the area disclosing protected health information is responsible for tracking and entering appropriate disclosures in Quick Disclosure or forwarding a file of

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disclosures to Health Information Services (HIS) for import into Quick Disclosure. Please refer to the Disclosure/Minimum Necessary Table on the HIS website at: <http://www.healthsystem.virginia.edu/intranet/HIS/UVa-PHI-Disclosures-Minimum-Necessary-Matrix-July-04-.pdf>

The following information must be tracked:

- Date of disclosure
  - Name and address, if known, of the entity or person receiving the protected health information
  - Brief description of the protected health information disclosed
  - Purpose of the disclosure.
- b. A health oversight agency or law enforcement official may request a temporary suspension of the individual's right to an accounting by making a statement that revealing the request in an accounting would be reasonably likely to impede the organization's activities, and specifying a time period for the suspension in Quick Disclosure, and can be given effect for no more than 30 days unless the official subsequently provides a statement in writing.
- c. Refer any questions or requests for an accounting to the Release of Information Section of Health Information Services, telephone 924-5136, Box 800476, 1222 Jefferson Park Avenue, Charlottesville, VA 22908.

SIGNATURE:

  
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R. Edward Howell, CEO, UVA Medical Center

DATE:

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6/20/13

Medical Center Policy No. 0256 (R)

Approved June 2004

Reviewed September 2007, June 2009

Revised June 2012, June 2013

Approved by Interim Chief Technology and Health Information Officer

Approved by Medical Center Administration