 <p>Heritage Provider Network &amp; Affiliated Medical Groups</p>	Program: HIPAA Compliance		
	Policy No.	Effective Date: 01/01/2012	Page - 1 -
	Authored by: Compliance Sub Committee	Date: 01/01/2012	Revised by: Sandy Finley
	Approved by: Compliance Committee	Date: 02/02/2015	Date: 02/02/2015
Title of Policy: Documentation and Accounting of Disclosures			

**PURPOSE:**

To ensure compliance with the HIPAA Privacy Standard: Right to an Accounting of Disclosures of Protected Health Information. Also, to define the types of disclosures included in a request for an accounting.

**POLICY:**


Heritage Provider Network and its Affiliated Medical Groups (HPN) recognize the patient’s right to receive an accounting of disclosures of protected health information made by any of the Heritage covered entities. Upon request, HPN will provide an accounting for a period of up to six (6) years prior to the date of request.

**RESPONSIBILITY:**

Compliance Officers and Medical Records Personnel

**PROCEDURES:**

1. Patients may request an accounting of disclosures by contacting the Compliance Officer or a member of the medical records department.
2. The patient will be provided with the requested accounting within 60 days of receiving written notification. In some circumstances, additional time may be required to produce such accounting and the patient will be notified that up to another 30 days may be essential.
3. Accounting of disclosures will include the following information:
  - a. Disclosures for the period requested, but not contrary to the guidelines set forth in this policy.
  - b. Dates of the disclosures.
  - c. Names and addresses of persons or entities receiving PHI.
  - d. Brief description of the information disclosed.
  - e. Brief statement of purpose of the disclosures.
  - f. Patients may receive one accounting within a 12 (twelve) month period. Additional accountings will be charged a reasonable cost assigned by each Heritage entity. Patients will be notified in advance if any fees are associated with the accounting.
  - g. We will temporarily suspend the individual’s right to receive an accounting upon written or oral notice by government health oversight agencies or law enforcement officials as provided in §164.512 (d) or (f).

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- h. HPN will maintain copies of all requests for accountings of disclosures for a period of ten (10) years. Information will be logged by using the HPN Accounting of Disclosure Log.
  - i. Information to be maintained on the Accounting of Disclosure Log will include: Patient's Name, Member ID, DOB, Address, Health Plan, Report Provided, Date of Request and Date Provided to Patient.
  - j. A hard copy of the information provided to the patient will be maintained by attaching it to the log.
  - k. Requests by the patient for the accounting will be maintained in the patient's medical record file or system.
4. The accounting is not required to include the following types of disclosures:
- a. Disclosures for purposes of treatment, payment and operations, or as part of a limited data set as provided in §164.506;
  - b. Disclosures to the patient, or authorized by the patient as provided in §164.508;
  - c. Disclosures made to persons involved in the patient's care as provided in §164.510;
  - d. Disclosures for national security or intelligence purposes as provided in §164.512 (k) (2) ;
  - e. Disclosure to correctional institutions or law enforcement officials in §164.512 (k) (5);
  - f. Disclosures prior to April 14, 2003.
  - g. Disclosures incident to or use or disclosure otherwise permitted or required by federal law as provided in §164.502.

REFERENCE: 45CFR, §164.502, §164.506, §164.508, §164.510, §164.512 (d) or (f), §164.512 (k) (2), §164.512 (k) (5), §164.528.