

The University of Iowa
HIPAA Privacy Rule
Policies and Procedures

ACCOUNTING OF DISCLOSURES OF PROTECTED HEALTH
INFORMATION

Purpose: To define the process for responding to requests from patients or their legal representatives to receive an accounting of Protected Health Information (PHI) disclosures made by health care units of the University of Iowa; to provide direction to staff members regarding their responsibilities when a patient requests an accounting of disclosures of their PHI.

Policy: It is the policy of the University to provide, at the patient's request, an accounting of disclosures made of the patients PHI. The accounting of disclosures may include up to six years prior to the date the accounting is requested and not prior to April 14, 2003.

Disclosures made under the following circumstances are excluded from the accounting:

- Disclosures made for purposes of treatment, payment, and operations (including education of future health professionals);
- Disclosures to the patient;
- Disclosures to people involved in the patient's care;
- Disclosures authorized by the patient or the patient's legal representative;
- Disclosures authorized or required by law.

Procedures:

- A patient must make the request for an accounting using the "Request for Accounting of Disclosures" form.
- These forms can be obtained from and submitted to the clinic administrator or care provider.
- Request for Accounting forms are to be sent to the UI Privacy Officer.
- UIHC will retain for a period of six years copies of the request and a copy of the written accounting that was provided to the patient.
- A patient may authorize in writing that the accounting of disclosures be released to another individual or entity. The request must clearly identify all information required to carry out the request (name, address, phone number, etc.).

Providing the accounting.

- The UI Privacy Officer will provide the patient with an accounting of disclosures within 60 days after receipt of the request.
 - If the accounting cannot be completed within 60 days after receipt of the request, the patient will receive a written statement of the reason for the delay and the expected completion date. The accounting must be provided to the patient within 90 days.
- The UI will provide the accounting to the individual at no charge for a request made once during any twelve-month period. A fee may be charged for any

additional requests made during a twelve-month period as explained in the Privacy Notice and on the request form.

***Definition of Protected Health Information (PHI):**

Individually identifiable health information transmitted or maintained in any form or medium, including oral, written and electronic. Individually identifiable health information relates to an individual's health status or condition, furnishing health services to an individual or paying or administering health care benefits to an individual. Information considered PHI where there is a reasonable basis to believe the information can be used to identify an individual.

Reference: 45 C.F.R. §164.528