



Procedures for Policy 2003-18 Accounting of Disclosures of Protected Health Information

Accounting Exceptions

1. An individual has a right to receive an accounting of disclosures of PHI made by UConn Health in the six (6) years prior to the date on which the accounting is requested, except for disclosures that are made:
 - a. to carry out treatment, payment or health care operations;
 - b. to the individual about the individual;
 - c. in the facility directory or to persons involved in the individual's care, or for notification purposes;
 - d. to a public or private entity authorized to assist in disaster relief efforts;
 - e. incident to an otherwise permitted use or disclosure;
 - f. pursuant to an authorization made by the individual;
 - g. for national security or intelligence purposes;
 - h. to correctional institutions or law enforcement officials related to the health care of inmates; or
 - i. as part of a limited data set.

Logging Disclosures

1. Disclosures of PHI that are subject to an individual's right to an accounting may be logged on a disclosure tracking log made for this purpose or an electronic equivalent.

Content of the Accounting

1. UConn Health will provide the individual with an accounting of disclosures, made in the six (6) years prior to the date of their request unless a shorter time period is specified.
2. The accounting will contain the following information:
 - a. the date of disclosure;
 - b. the name of the recipient of the information (organization, individual, etc.) and address, if known, unless providing the name and address of the recipient would require UConn Health to disclose another individual's PHI;
 - c. a brief description of the PHI disclosed; and
 - d. a brief statement of the purpose of the disclosure (or a copy of the written request for disclosure in lieu thereof).
3. For disclosures that are made many times for the same purpose to the same person or entity, the accounting may include the frequency or number of disclosures noting the first and last dates only. Individual dates of each disclosure are not required.

4. Special rules apply to accounting for certain research-related disclosures. The Responsible Department, as defined below, will contact the Office of Healthcare Compliance and Privacy for guidance.
5. When UConn Health is the covered entity in a Business Associate Agreement with a third party, the Business Associate Agreement will include language that requires the business associate to document such disclosures of PHI and information related to such disclosures as would be required for UConn Health to respond to a request by an individual for an accounting of disclosures and to either provide such information to UConn Health or directly to the individual.

Responding to an Individual's Request for an Accounting of Disclosures

1. Requests for an accounting of disclosures must be made in writing and directed to either the Director of Health Information Management for medical records, the Office of Dental Clinical Affairs for dental records, or the Principal Investigator (PI) of the specific study for research records (each a "Responsible Department").
2. The Responsible Department has sixty (60) days to respond to a request for an accounting, but may have a one-time extension of thirty (30) days as long as the Responsible Department provides the individual with written notice of the reason for the delay and a date by which the accounting will be provided to the individual. Such notice must be provided within sixty (60) days of receipt of the individual's request.
3. The Responsible Department, in consultation with the Office of Healthcare Compliance and Privacy, will compile the accounting. The Responsible Department may also consult with other areas/departments as needed.
4. The Responsible Department will mail the completed accounting to the individual. If no disclosures qualify for an accounting of disclosures, the Responsible Department will notify the individual in writing that no applicable disclosures were made.
5. The information required to be included in an accounting and the written accounting that is provided to the individual will be maintained for no less than six (6) years.
6. The first request for an accounting in a twelve (12) month period is free to the individual. Thereafter, UConn Health may charge a reasonable, cost based fee.

Suspension of Accounting

In rare instances, a health oversight agency or law enforcement official may request to suspend a patient's right to receive an accounting of disclosures made to that agency or official. In such cases, the Office of Healthcare Compliance and Privacy will assist the Responsible Department in responding appropriately to the patient.