


<p><b>DEPARTMENT:</b> Compliance</p> <p><b>POLICY TITLE:</b> CMP29 Documentation and Accounting of Disclosures</p>		
<p><b>REVIEWED BY:</b> Compliance Officer</p>	<p><b>REVIEW DATE:</b> 11/08/2019</p>	<p><b>EFFECTIVE DATE:</b> 12/01/2019</p>
<p><b>APPROVED BY:</b> Compliance Committee</p>	<p><b>APPROVAL DATE:</b> 11/11/2019</p>	

**PURPOSE:**

To ensure that Arizona Priority Care (AZPC) complies 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:**

It is AZPC’s policy to 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.

**PROCEDURE:**

1. Patients may request an accounting of disclosures by contacting the Privacy 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

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- enforcement officials as provided in 45 CFR §164.512 (d) or (f).
- h. AZPC will maintain copies of all requests for accountings of disclosures for a period of ten(10) years. Information will be logged by using the AZPC 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 45 CFR §164.506;
  - b. Disclosures to the patient, or authorized by the patient as provided in 45 CFR §164.508;
  - c. Disclosures made to persons involved in the patient's care as provided in 45 CFR §164.510;
  - d. Disclosures for national security or intelligence purposes as provided in 45 CFR §164.512 (k)(2);
  - e. Disclosure to correctional institutions or law enforcement officials in 45 CFR §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 45 CFR §164.502.

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**DEFINITIONS:**

None

**REFERENCES:**

Heritage Provider Network Policies  
45 CFR §164.502, 506, 508, 510, 512(d-k), and §164.528.

**APPENDICES:**

None

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**DOCUMENT REVISION LOG**

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