



Authorization for Release of Protected Health Information Policy

Department/Unit: Corporate Compliance
 Revision/Review Date:
 Effective Date: 08/01/2017
 Approved by: Senior Leadership Team

Purpose

To ensure the confidentiality and security of Protected Health Information (PHI) being released and transmitted by Pioneer Human Services (PHS).

Definitions

Health Insurance Portability and Accountability (HIPAA) – Health Insurance Portability and Accountability Act of 1996 Federal law that restricts access to individuals' private medical information.

Release of Information (ROI) – The disclosure of information regarding a person/client to an outside entity in accordance with legal guidelines.

Protected Health Information (PHI) – PHI is the documentation of the healthcare services provided to an individual in any aspect of health care delivery by a healthcare provider. The PHI is individually identifiable data, in any medium, collected and directly used in and/or documenting healthcare or health status. The PHI includes records of care in any University unit/department or School while providing patient care services, reviewing patient data, or documenting observations, actions or instructions.

Policy

- I. PHS clients are protected under the federal regulations governing Confidentiality of Alcohol and Drug Abuse Patient Records, 42 Code of Federal Regulations (CFR) Part 2, and the Health Insurance Portability and Accountability Act of 1996 (HIPAA), 45 CFR, Parts 160 and 164, and PHI cannot be disclosed without written consent unless otherwise provided for in the regulations.
- II. Information may be released by PHS without an authorization in the following circumstances:
 - A. Health care emergencies in which the need to know clearly outweighs the confidentiality consideration;
 - B. For the purpose of conducting treatment, payment and healthcare operations;
 - C. Pursuant to federal, state or local mandatory reporting requirements; and
 - D. An inmate of a correctional institution or under the custody of a law enforcement official:
 1. For the institution to provide the individual with healthcare
 2. To protect the individual's or another individual's health and safety
 3. For the safety and security of the correctional institution
- III. PHI is the property of Pioneer Human Services and is maintained and disclosed for the purpose of treatment, payment and healthcare operations, research, and education consistent with legal and regulatory agency requirements or upon the patient's expressed written consent.
- IV. Pioneer Human Services' estimated turnaround time for a processing and releasing client records is 7 – 14 business days. The Medical Records Coordinator at the unit is expected to contact the requesting entity if there is an expected delay.
- V. All requesting entities are required to use the Pioneer Human Services Authorization to Release Patient Health Information form and must be signed by the client or their legal representative. This form is available on the PHS external website, internal intranet (Pionet) and available upon request.
 - A. Exception: PHS will accept the Division of Disability Determination Services' Authorization to Disclose Information to the Social Security Administration (SSA) form including the use of an electronic signature.

- VI. Any employee's failure to abide by this policy may result in disciplinary action that could include termination of employment.

Related Content/Documents

Guidelines for Release of Protected Health Information

Authorization for Release of Protected Health Information (Form # AD809)