

Turn Awareness into Action...

The 411 on “Accounting of Disclosures”

WHAT

When PHI is disclosed to a third party for purposes **OTHER THAN** the following, it must be tracked in UCMC’s web-based Disclosure Tracking system (DisclosureTrac).

- ✓ Disclosures for purposes of treatment, payment, or health care operations.
- ✓ Disclosures after a patient’s signed authorization is obtained (*authorization shall be maintained in the patient’s medical record*).
- ✓ Disclosures which PHI has been de-identified.
- ✓ Disclosures to the patient regarding his/her own health information.

Below are categories for which disclosures **NEED** to be accounted. More information can be found on the HIPAA Program Office website – see the *Accounting of Disclosures Definition Table*.

- ✓ Abuse/Neglect
- ✓ Communicable Disease Exposure Notification
- ✓ Coroner , Medical Examiner or Funeral Director
- ✓ Judicial, Legal and Administrative Proceedings
- ✓ Employment Related - (OSHA)
- ✓ Erroneous – (e.g. Misdirected fax or message left on answering machine)
- ✓ FDA Reporting
- ✓ Government Protective Services
- ✓ Health Oversight Activities
- ✓ Military- Benefits Determination (e.g. CHAMPUS, Tricare)
- ✓ Organ Procurement – Gift of Hope
- ✓ Law Enforcement
- ✓ Public Health Authority
- ✓ Wound or Injury Reporting

WHY

Our patients have a right to receive a report listing specific information related to disclosures that need to be accounted for under the HIPAA Privacy Rule.

HOW

To enter disclosures you need access to the DisclosureTrac system. The *DisclosureTrac Software and Downtime/Tracking Form* can be found at <http://home.uchospitals.edu>. (Select the TAB: Clinical → COMPLIANCE → Disclosure Tracking)

WHO

To request a password and/or training contact Marjorie LaPlanche, HIM Project Manager, at 5-0199

Contact the HIPAA Program Office at 4-9716 with questions or visit our website at <http://hipaa.bsd.uchicago.edu>