The HIPAA Privacy Rule provides an individual with the right to receive a listing, known as an Accounting of Disclosures, which provides information about when the University of Chicago Medicine (UCM) discloses the individual's Protected Health Information (PHI) outside of the UCM.

To facilitate the accounting of disclosures, UCM employees are required to log applicable disclosures in Epic using the feature titled "Quick Disclosure." Any disclosure meeting the criteria outlined in the Accounting of Disclosures Definition Table below must be entered into the system. The information captured in the system is linked to the patient's medical record number (MRN), and will allow us to respond completely and accurately to all required patient requests for an accounting of disclosures.

The following are disclosures that DO NOT need to be accounted for (HIPAA Privacy Policy 05-13 “Accounting of Disclosures of Protected Health Information”):

1. Disclosures made prior to April 14, 2003;
2. Disclosures made to the patient;
3. Disclosures made for purposes of treatment, payment, or health care operations (see Policy 05-12 “Permitted Uses and Disclosures to Carry out Treatment, Payment and Health Care Operations”)
4. Disclosures incident to a use or disclosure otherwise permitted (see Policy 05-28 “Minimizing Incidental Uses and Disclosures of Protected Health Information”. An example would be calling a patient name while in the waiting area.
5. Disclosures made after a patient’s signed authorization is obtained (authorization shall be maintained in the patient’s medical record);
6. Disclosures made for national security or intelligence purposes
7. Disclosures to correctional institutions or law enforcement officials (see Policy 05-25 “Uses and Disclosures Based on Public Policy Which Do Not Require the Patient’s Authorization”)
8. Disclosures that are part of a Limited Data Set (see Policy 05-22 “Disclosures of De-identified Health Information”)
The University of Chicago Medicine
Privacy Program
Accounting of Disclosures Definition Table

The chart below illustrates the types of disclosures that need to be accounted for under the HIPAA Privacy Rule. This tool should be used as a reference for identifying disclosures (not all potential disclosures are listed under the “For Instance” column) that are made and the specific disclosure category under which the data entry should be recorded. If you have any questions regarding this tool or specific required disclosures that your department makes and must be tracked, please contact the Privacy Program at 773-834-9716 for assistance.

<table>
<thead>
<tr>
<th>Quick Disclosure Category</th>
<th>Description</th>
<th>For Instance:</th>
<th>UCMC Admin. Policy</th>
</tr>
</thead>
</table>
| Abuse/Neglect             | **Child Abuse Reporting:** To a public health authority or other appropriate government authority authorized by law to receive reports of child abuse or neglect | Do you disclose patient information related to abuse to the:  
☑ Department of Aging (DOA)  
☑ Department of Children and Family Services (DCFS)  
☑ Department of Human Services (DHS)  
☑ OIG’s Developmentally Disabled Adult Hotline | 05-25(2)&(3) |
|                           | **Other Abuse, Neglect or Domestic Violence Reporting:** To a governmental authority authorized by law to receive reports of abuse, neglect, or domestic violence |                                                                              |                    |
| Communicable Disease      | **Communicable Disease Exposure Notification:** To a person who may have been exposed to a communicable disease or may otherwise be at risk of contracting or spreading a disease or condition, if UCMC or public health authority is authorized by law to notify such person as necessary in the conduct of a public health intervention or investigation | During the course of an investigation, The University of Chicago may be asked by public health authorities to disclose information (including PHI) to a person who may have been exposed to a communicable disease.  
This is complex and case by case specific. If you have questions, please contact Legal Affairs. | 05-25(2)(d) |
<table>
<thead>
<tr>
<th>Quick Disclosure Category</th>
<th>Description</th>
<th>For Instance:</th>
<th>UCMC Admin. Policy</th>
</tr>
</thead>
</table>
| Coroner                  | **Coroner or Medical Examiner:** To a coroner or medical examiner for such official's authorized duties under the Illinois Counties Code or other applicable Illinois or federal law. | ☑ Cause of death  
☑ Time of death  
☑ Information contained in the patient’s “death pack” | 05-25(7)           |
| Court                    | **Judicial and Administrative Proceedings:** In the course of any judicial or administrative proceeding. | If you receive the following:  
☑ Subpoena and/or Court Order (e.g. guardianship matters)  
☑ Search Warrant | 05-25(5)           |
| Employer                 | **Employment-related Disclosure:** To an employer, about a patient who is a member of the workforce of the employer, in connection with medical surveillance of the workplace or to evaluate a work-related illness or injury. | ☑ Occupational Safety and Health Administration (OSHA ) requirements such as tracking needle sticks and other work related injuries  
☑ Agency Nurses – medical information to manager stating that nurse can’t work (e.g. public safety issue (+ culture)) | 05-25(2)(e)       |
| Erroneous                | **Other:** A mistaken disclosure of Protected Health Information without the patient’s authorization or pursuant to a defective authorization, if UCMC is aware of the mistake | ☑ Fax sent to wrong number  
☑ Information mailed to wrong address  
☑ Message at wrong number  
☑ Inappropriate or detailed message left on answering machine  
☑ Verbal disclosure to unauthorized 3rd party  
☑ Lost or stolen records  
☑ Knowledge of unauthorized disclosures (identity theft, stolen equipment containing PHI) | 05-20              |
# The University of Chicago Medicine
## Privacy Program
### Accounting of Disclosures Definition Table

<table>
<thead>
<tr>
<th>Quick Disclosure Category</th>
<th>Description</th>
<th>For Instance:</th>
<th>UCMC Admin. Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FDA Report</strong></td>
<td><strong>FDA Reporting:</strong> To a person subject to the jurisdiction of the Food and Drug Administration.</td>
<td>☒ Safety or Effectiveness of a FDA regulated product or activity&lt;br&gt;☑ Adverse events, product defects or biological product deviations&lt;br&gt;☑ Track products&lt;br&gt;☑ Enable product recalls repairs or replacements&lt;br&gt;☑ Conduct post marketing surveillance&lt;br&gt;☑ Manufacturers of defective products&lt;br&gt;☑ Review of oxygen tanks&lt;br&gt;☑ Flouride contamination in dialysis equipment</td>
<td>05-25(2)(c)</td>
</tr>
<tr>
<td><strong>Funeral Director</strong></td>
<td><strong>Funeral Director:</strong> To a funeral director, as necessary for the funeral director to carry out its duties with respect to a decedent (regardless of whether the disclosure to the funeral director is made prior to or after the individual’s death).</td>
<td>☒ Cause of death&lt;br&gt;☑ Time of death&lt;br&gt;☑ Coordinate funeral logistics on behalf of family (e.g. advocacy)</td>
<td>05-25(7)</td>
</tr>
<tr>
<td><strong>Government Protective Services</strong></td>
<td><strong>Protective Services:</strong> To authorized federal government officials for the provision of protective services to the President of the United States, foreign heads of state, and certain other government officials and to conduct investigations related to such protective services.</td>
<td>☒ Homeland Security</td>
<td>05-25(10)(c)</td>
</tr>
</tbody>
</table>
### Health Oversight

**Health Oversight Activities:** To a health oversight agency for oversight activities authorized by law, including audits; civil, administrative or criminal investigations; inspections; licensure or disciplinary actions; civil, administrative, or criminal proceedings or actions; or other activities necessary for appropriate oversight of:

- **i.** the health care system;

- **ii.** government benefit programs for which health information is relevant to beneficiary eligibility;

- **iii.** entities subject to government regulatory programs for which health information is necessary for determining compliance with program standards; or

- **iv.** entities subject to civil rights laws for which health information is necessary for determining compliance.

Do you disclose PHI related to the following for reasons other than treatment, payment or other healthcare operations:

- National Practitioner Databank
- Practitioner licensure agencies and boards
- Surveys
- Complaint investigations
- Ombudsman
- Corporate compliance
- Centers for Disease Control (CDC)
- Drug Enforcement Administration (DEA)
- Occupational Safety and Health Administration (OSHA)
- Federal Emergency Management Agency (FEMA)
- Department of Justice (DOJ)
- Environmental Protection Agency (EPA)
- Social Security
- Disability (e.g. Supplemental Security Income (SSI))
- Federal Employee Health Benefits Program (FEHB)
- Illinois Department of Professional Regulation (IDPR)
- Illinois Department of Public Health (IDPH)

UCMC Admin. Policy: 05-25(4)
<table>
<thead>
<tr>
<th>Quick Disclosure Category</th>
<th>Description</th>
<th>For Instance:</th>
<th>UCMC Admin. Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Legal Process</strong></td>
<td><strong>Response to Legal Process:</strong> Pursuant to a court order or court-ordered warrant, or a subpoena or summons issued by a judicial officer; a grand jury subpoena; or an administrative request, including an administrative subpoena or summons, a civil or an authorized investigative demand, or similar process authorized under law</td>
<td>If you receive the following:</td>
<td>05-25(5)&amp;(6)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Subpoena and/or Court Order</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Search Warrant</td>
<td></td>
</tr>
<tr>
<td><strong>Military</strong></td>
<td><strong>Armed Forces Personnel:</strong> To appropriate U.S. or foreign military command authorities regarding an individual who is a member of U.S. or foreign armed forces.</td>
<td>If you disclose information related to Military and Veterans activities such as:</td>
<td>05-25(10)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Benefits determination (e.g., CHAMPUS, Tricare)</td>
<td></td>
</tr>
<tr>
<td><strong>Organ Procurement</strong></td>
<td><strong>Organ Procurement:</strong> To an organ procurement organization for organ, eye, or tissue donation purposes.</td>
<td>If you disclose information to transplant donor networks such as:</td>
<td>05-25(8)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Gift of Hope Organ and Tissue Donor Network</td>
<td></td>
</tr>
<tr>
<td><strong>Other Disease</strong></td>
<td><strong>Required by Law:</strong> As required by law (e.g., mandated disease reporting), but not disclosures to law enforcement under Administrative Policy 05-25(11)</td>
<td>Types of disease may include:</td>
<td>05-25(2)(a)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Small Pox</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ West Nile</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Rabies (human or animal)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Botulism</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Anthrax</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>See Infection Control Policy Section 02-04 on reporting requirements</td>
<td></td>
</tr>
<tr>
<td><strong>Police</strong></td>
<td><strong>Law Enforcement:</strong> To a law enforcement official either based on the official’s request for Protected Health Information or on UCMC’s own initiative, but not disclosures to law enforcement under</td>
<td>Do you report suspicious injuries such as:</td>
<td>05-25(6)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Gunshot wounds</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Burns</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>☑ Domestic Violence related injuries</td>
<td></td>
</tr>
</tbody>
</table>
### Accounting of Disclosures Definition Table

| Administrative Policy 05-25(11) | ✓ Suspicious deaths  
|                                | ✓ Fractures  
|                                | ✓ Assaults  
| **Do you report information related to:** |  
| ✓ Locating a suspect of a crime, fugitive, material witness, or missing person  
| ✓ Victims of Crime  
| ✓ Crimes on premises  
| ✓ Avert a serious threat to health or safety  
| ✓ Crime Lab |

<table>
<thead>
<tr>
<th>Public Health</th>
<th>Public Health Authority: To a public health authority that is authorized by law to collect information for the purpose of preventing or controlling disease, injury, or disability.</th>
</tr>
</thead>
</table>
| **Do you disclose reports on:** | ✓ Vital statistics  
| ✓ Maternal deaths  
| ✓ Fetal deaths (APORS(Adverse Pregnancy Outcome Reporting System)  
| ✓ Birth Certificates  
| ✓ Death Certificates  
| ✓ Teen suicide  
| ✓ Traumatic brain or spinal injuries  
| ✓ Immunizations/Immunization Registry  
| ✓ Trauma Registry  
| ✓ Animal Control (victims of dog bites)  
| ✓ Newborn hearing test (IDPH)  
| ✓ Positive STD Results on Children (IDPH) |

Last revision September 2017  
Originally Effective – 12/12/06
# The University of Chicago Medicine Privacy Program
## Accounting of Disclosures Definition Table

<table>
<thead>
<tr>
<th>Quick Disclosure Category</th>
<th>Description</th>
<th>For Instance:</th>
<th>UCMC Admin. Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Safety</strong></td>
<td><strong>Threat to Health or Safety:</strong> To a third party to prevent serious threat to health or safety.</td>
<td>Disclosed information related to:</td>
<td></td>
</tr>
</tbody>
</table>
  - Blood borne pathogens (e.g. hepatitis virus)  
  - Psychiatric patient information to potential victims in accordance with state law and imminent threat.  
  - Consumer Product Safety Commission  
  - Patient elopement  
  - “Duty to Warn” events | 05-25(9) |
| **Research**               | **Research:** Pursuant to a waiver of the authorization requirement for the use and disclosure of Protected Health Information for research purposes or preparatory to research. | Information disclosed to external sponsors prior to obtaining a patient’s consent  
  - Screening logs disclosed to a sponsor to determine the number of subjects screened  
  - IRB grants a waiver of authorization (e.g., retrospective chart review, study involving existing samples)  
  - Information disclosed to an outside principal investigator (PI) or sponsor | 05-35 |
| **Workers Compensation**   | **Workers’ Compensation:** As authorized by and to comply with workers’ compensations laws (i.e., laws that provide compensation for work-related injuries and illnesses regardless of fault). | Subpoena from Illinois Workers Compensation Commission with Qualified Protective Order | 05-36) |
| **Wound-Injury**           | **Wound or Injury Reporting:** As required by law including laws that require the reporting of certain types of wounds or other physical injuries. |  
  - Gunshot wounds (State Medical Examiner)  
  - Burns | 05-25(6)(a) |