Guidance: Tracking PHI Disclosures in Epic Quick Disclosure

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When a patient’s information is disclosed outside of the University of Chicago Medicine for reasons other than treatment, payment, operations, upon a signed authorization, or it is de-identified it must be documented in the Quick Disclosure section of Epic. Patients or their personal representatives may request and receive an Accounting of these Disclosures of PHI within the prior 6 years.

Patients are informed of this right to an 'Accounting of Disclosures' in our Notice of Privacy Practices. Requests for an Accounting of Disclosure are processed by the Privacy Program.

The following types of disclosures must be tracked:

• Reports of child abuse, neglect, or domestic violence
• Any disclosure required by law (state encounter data, infectious disease reporting, etc.)
• Disclosures to funeral directors, coroners, and medical examiners
• Disclosures in accordance with a judicial subpoena
• Public health activities (births, deaths, public health investigations, adverse events, work related injuries, FDA required reporting, etc.)
• Health oversight activities (audits and investigations by Government benefit or regulatory programs)
• Specialized government functions (law enforcement custodial situations)
• Disclosure of certain law enforcement purposes (identification of a suspect or missing person, identification of a crime victim, suspected crime, etc.)
• Disclosures to organ procurement and banking organizations
• Disclosures to a third party when the safety of an individual is at risk (threat of violence)
• Disclosure for research with a waiver of informed consent from the IRB
• Workers' compensation disclosures
• Disclosures made in error (e.g. faxed to a wrong number or message left on the wrong answering machine)
More information related to these disclosures and a list of the types of disclosures we must account for is found in the Accounting of Disclosure Definition Table.

There is a centralized electronic system to log the disclosures in Epic called "Quick Disclosure." Any disclosure meeting the criteria outlined in the Accounting of Disclosure Definition Table must be entered in the Quick Disclosure section located within the individual patient’s medical record and will allow us to respond completely and accurately to patient requests for an accounting of disclosures.

The "Quick Disclosure" function can be accessed through the button "More Activities" in the Activity Navigator in a patient's individual medical record in Epic.

Any questions/comments/concerns please feel free to reach out to the Privacy Program at:

773-834-9716 or hpo@bsd.uchicago.edu