



Pennsylvania Hospital  
& Surgery Center  
**ADMINISTRATIVE POLICY MANUAL**

Page 1  
Effective: 0408

**SUBJECT: USES AND DISCLOSURES OF PROTECTED HEALTH INFORMATION (PHI) FOR TREATMENT, PAYMENT AND HEALTHCARE OPERATIONS**

**POLICY NUMBER: HIP20**

Issued:

Committee Approval:  
HIPAA

Administrative Policy  
Review Committee:  
April 2003  
April 2004  
April 2005  
April 2006  
April 2007  
April 2008

Attachment(s):

Related Policies:  
[HIP9 Disclosure of Information for the Patient Information System](#)

[HIP10 Disclosure of Protected Health Information to Family and Friends](#)

[HIP8 Disclosures Where No Form of Patient Permission is Required](#)

## POLICY

For purposes of this policy, Pennsylvania Hospital includes all off campus licensed facilities, including but not limited to the Surgery Center of Pennsylvania Hospital.

It is the policy of Pennsylvania Hospital that protected health information (PHI) will be used and disclosed in a manner that respects a patient's right to privacy, and in accordance with HIPAA privacy regulations and applicable laws.

## SCOPE

This policy applies to all uses or disclosures of PHI for the purposes of treatment, payment, and health care operations (TPO).

## IMPLEMENTATION

This policy will be implemented by all those who use and disclose PHI.

## DEFINITIONS

Protected health information (PHI) is information that is created or received by UPHS and the School of Medicine; and relates to the past, present, or future physical or mental health or condition of a patient; the provision of health care to a patient; or the past, present, or future payment for the provision of health care to a patient; and that identifies the patient or for which there is a reasonable basis to believe the information can be used to identify the patient. PHI includes information of persons living or deceased. The following components of a patient's information also are considered PHI: a) names; b) street address, city, county, precinct, zip code; c) dates directly related to a patient, including birth date, admission date, discharge date, and date of death; d) telephone numbers, fax numbers, and electronic mail addresses; e) Social Security numbers; f) medical record numbers; g) health plan beneficiary numbers; h) account numbers; i) certificate/license numbers; j) vehicle identifiers and serial numbers, including license plate numbers; k) device identifiers and serial numbers; l) Web Universal Resource Locators (URLs); m) biometric identifiers, including finger and voice prints; n) full face photographic images and any comparable images; and o) any other unique identifying number, characteristic, or code.

Use means, with respect to individually identifiable health information, the sharing, employment, application, utilization, examination, or analysis of such information within UPHS and the School of Medicine.

Disclosure means the release, transfer, provisions of access to, divulging in any other manner of information outside UPHS and the School of Medicine.

<p>Pennsylvania Hospital &amp; Surgery Center</p> <p><b>ADMINISTRATIVE POLICY MANUAL</b></p>	<p>Page 2</p> <p>Effective: 0408</p>
<p>SUBJECT: <b>USES AND DISCLOSURES OF PROTECTED HEALTH INFORMATION (PHI) FOR TREATMENT, PAYMENT AND HEALTHCARE OPERATIONS</b></p> <p>POLICY NUMBER: <b>HIP20</b></p>	

Treatment means the provision, coordination, or management of health care and related services by one or more health care providers, including the coordination or management of health care by a health care provider with a third party; consultation between health care providers relating to a patient; or the referral of a patient for health care from one health care provider to another.

Payment means the activities undertaken by a health plan to obtain premiums or to determine or fulfill its responsibility for coverage and provision of benefits under the health plan; or a covered health care provider or health plan to obtain or provide reimbursement for the provision of health care.

Health care operations means any of the following activities; conducting quality assessment and improvement activities; reviewing the competence or qualifications of health care professionals; conducting or arranging for medical review, legal services, and auditing functions, including fraud and abuse detection and compliance programs; business planning and development; business management and general administrative activities.

#### **PROCEDURE**

1. Pennsylvania Hospital may use or disclose PHI for its own treatment, payment, or health care operations.
2. Pennsylvania Hospital may disclose PHI for treatment activities of a health care provider.
3. Pennsylvania Hospital may disclose PHI to another covered entity or a health care provider for the payment activities of the entity that receives the information.
4. Pennsylvania Hospital may disclose PHI to another covered entity for the health care operations activities of the entity that receives the information, if each entity either has or had a relationship with the patient who is the subject of the PHI being requested, the PHI pertains to such relationship, and the disclosure is for the purpose of:
  - a) Conducting quality assessment and improvement activities, including outcomes evaluation and development of clinical guidelines, provided that the obtaining of generalizable knowledge is not the primary purpose of any studies resulting from such activities; population-based activities relating to improving health or reducing health care costs, protocol development, case management and care coordination, contacting of health care providers and patients with information about treatment alternatives; and related functions that do not include treatment;

Pennsylvania Hospital & Surgery Center  <b>ADMINISTRATIVE POLICY MANUAL</b>	Page 3  Effective: 0408
<b>SUBJECT: USES AND DISCLOSURES OF PROTECTED HEALTH INFORMATION (PHI) FOR TREATMENT, PAYMENT AND HEALTHCARE OPERATIONS</b>	
<b>POLICY NUMBER: HIP20</b>	

- b) Reviewing the competence or qualifications of health care professionals, evaluating practitioner and provider performance, health plan performance, conducting training programs in which students, trainees, or practitioners in areas of health care learn under supervision to practice or improve their skills as health care providers, training of non-health care professionals, accreditation, certification, licensing, or credentialing activities;
- c) Health care fraud and abuse detection or compliance.

A. See also:

- Policy HIP9, Use / Disclosure of Information from the Patient Information System
- Policy HIP10, Disclosures to Family and Friends
- Policy HIP8, Disclosure Where no Form of Patient Permission is Required

/s/Kathleen Kinslow  
 Kathleen Kinslow, CRNA, EdD, MBA  
 Executive Director

05/05/08  
 Date

**Disclaimer:** Any printed copy of this policy is only as current as of the date it was printed; it may not reflect subsequent revisions. Refer to the on-line version for most current policy.

Use of this document is limited to University of Pennsylvania Health System workforce only. It is not to be copied or distributed outside the institution without administrative permission.