



<p>Pennsylvania Hospital & Surgery Center</p> <p>ADMINISTRATIVE POLICY MANUAL</p>	<p>Page 1</p> <p>Effective: 0408</p>
<p>SUBJECT: PATIENT REQUESTS TO RECEIVE PROTECTED HEALTH INFORMATION BY ALTERNATE MEANS OR AT ALTERNATE LOCATIONS</p> <p>POLICY NUMBER: HIP6</p>	

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Attachment(s):
[FORM - Request to
Receive Confidential
Communication of
PHI by Alternate
Means or at
Alternate Locations](#)

Related Policies:

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.

Patients have the right to request to receive confidential communications of their protected health information (PHI) from healthcare providers by alternative means or at alternative locations, and have such requests accommodated when reasonable. It is the policy of Pennsylvania Hospital to respond to those requests in a manner that respects the patient, and in accordance with HIPAA privacy regulations and applicable law.

PURPOSE

It is the purpose of this policy to identify the process for responding to a patient request to receive confidential communications of their PHI by alternative means or at alternative locations.

SCOPE

This policy applies to all patient requests to receive confidential communications of their PHI by an alternative means or at alternative locations.

IMPLEMENTATION

This policy is to be implemented by any member of the workforce who communicates PHI to patients.

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.

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PROCEDURE

1. Making Requests to Receive Confidential Communications of Protected Health Information by Alternative Means or at Alternative Locations.

- a) Patient requests for one-time or short-term communications of PHI by alternative means or at alternative locations may be requested verbally, but must be documented in the patient's record.
- b) Patients requesting long-term or permanent confidential communications should be provided with a copy of the Request to Receive Confidential Communications of Protected Health Information by Alternative Means or at Alternative Locations form (linked to this policy) to fill out and return to the Admissions Department. All long-term or permanent requests must be made on this form, which must be kept in the patient record.

2. Decisions Regarding Requests

- a) A determination as to whether the request is reasonable should be based, in part, on the administrative difficulty of complying with the request. If reasonable, the request should be granted.
- b) Pennsylvania Hospital shall not require that the patient explain the reason for the request, but may consider the reason if the patient provides it.
- c) Decisions regarding patient requests for one-time or short-term communications that are handled verbally shall be documented in the patient record.
- d) Decisions regarding patient requests for long-term or permanent confidential communications shall be communicated to the patient, documented on the form in the space provided, and kept in the patient record. If applicable, the patient information system should be modified to reflect the decision.

3. Accommodations

If Pennsylvania Hospital agrees to send a patient's PHI by alternative means or to an alternative location, Pennsylvania Hospital's workforce may not communicate that patient's PHI in violation of that agreement.

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

05/05/08
 Date

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