



<p>Pennsylvania Hospital & Surgery Center</p> <p>ADMINISTRATIVE POLICY MANUAL</p>	<p>Page 1</p> <p>Effective: 0408</p>
<p>SUBJECT: DISCLOSURE OF INFORMATION FROM THE PATIENT INFORMATION SYSTEM</p> <p>POLICY NUMBER: HIP9</p>	

Issued:

Committee Approval:
HIPAA

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

Attachment(s):

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.

It is the policy of Pennsylvania Hospital that the information in the patient information system used or disclosed for directory purposes will be released in a manner that respects a patient's right to privacy, and in accordance with HIPAA privacy regulations and applicable law.

PURPOSE

It is the purpose of this policy to outline procedures for the appropriate handling of information in the patient information system used or disclosed for directory purposes.

SCOPE

This policy applies to all patient information of Pennsylvania Hospital used or disclosed for directory purposes.

IMPLEMENTATION

Members of our workforce who respond to requests by persons from outside UPHS for patient information for directory purposes are responsible for implementing this policy.

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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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.

PROCEDURE

1. Providing an Opportunity to Object

a) The Notice of Privacy Practices will inform Pennsylvania Hospital's patients of the potential uses and disclosures of their PHI for directory purposes from the patient information system, and will provide patients with an opportunity to object or restrict such uses or disclosures by instructing them to do so at the time of admission or presentation for appointment. Patients objecting to the disclosure of some or all of the following information should be directed to speak with a Patient Access Representative, and their objections recorded in the patient information system.

2. Patients admitted to a behavioral health unit

a) PHI of a person admitted to a behavioral health unit will not be disclosed from the patient information system. However, such patients or their authorized representatives may choose to have their information disclosed, if they so designate.

3. Using and Disclosing PHI from the Patient Information System for Directory Purposes

a) Unless a patient has objected, as specified in the Notice of Privacy Practices and as recorded in the Patient Information System, Pennsylvania Hospital may use and disclose the following PHI from the patient information system for directory purposes:

- i. patient's name;
- ii. patient's location in the facility (for example, room number);
- iii. a general description of the patient's condition that does not communicate specific medical information about the patient (for example, "good", "fair", "poor", "critical");
- iv. the patient's religious affiliation to members of the clergy.

b) Information may be used or disclosed for directory purposes to:

- i. members of the clergy, or
- ii. except for religious affiliation, to other persons who ask for the patient by name.

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4. Opportunity to Object Impractical

- a) If the opportunity to object to permitted uses and disclosures is impractical due to the patient's incapacity or an emergency treatment situation, Pennsylvania Hospital may use and disclose some or all of the above information for directory purposes, if such use or disclosure is:
 - i. consistent with a prior preference expressed by the patient, if any, that is known to Pennsylvania Hospital, and
 - ii. in the patient's best interest as determined by Pennsylvania Hospital, in the exercise of professional judgment.

- b) Pennsylvania Hospital must inform patients of uses and disclosures for directory purposes, and provide them with an opportunity to object to further such uses and disclosures when it becomes practicable to do so.

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

05/05/08
 Date

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