

University of Minnesota

Policy & Procedure – Accounting of Disclosures – Clinical Operations Units

Individuals who receive care from any University of Minnesota health facility covered by the *University of Minnesota Notice of Privacy Practices* have a right to request an accounting of disclosures. The request must be in writing and submitted to the University of Minnesota Health Information Privacy & Compliance Office (HIPCO). Contact information for HIPCO is provided in the *University of Minnesota Notice of Privacy Practices*.

Upon receipt of a request for an accounting of disclosures, HIPCO will coordinate the response to the individual with the respective University of Minnesota health facility. The response must be made within 60 days of the individual's request, unless there are circumstances which prevent responding within 60 days, in which case the response time may be extended by an additional 30 days, provided the individual is notified in writing of such extension. A reasonable fee may be charged to any individual requesting more than one accounting of disclosures in a 12-month period.

The accounting of disclosures will include disclosures for the time period that is the lesser of (i) such time period as is requested by the individual, or (ii) 6 years preceding the date of the individual's request.

The accounting of disclosures will **not** include the following types of disclosures:

- To carry out treatment, payment or health care operations;
- To the individual himself/herself, or to the individual's guardian or legal representative;
- Authorized by the individual himself/herself, or by the individual's guardian or legal representative;
- To persons involved in the individual's care;
- For facility directories;
- For national security or intelligence purposes;
- To correctional institutions or to law enforcement with custody of the individual; or
- As part of a limited data set used for research purposes in accordance with HIPAA.

All other disclosures will be included in the accounting of disclosures. Each disclosure identified for inclusion in the response to the individual must include:

- The date of the disclosure;
- The name of the individual or organization who received the information, including address if known;
- A brief description of the information disclosed; and
- A brief statement describing the purpose of the disclosure.

HIPCO will coordinate the maintenance of responses to individuals requesting an accounting of disclosures, which responses will be maintained for a period of at least 6 years.

Effective Date: October 20, 2016