



FAQ about the Accounting of Disclosures Log

What is an Accounting of Disclosures Log? HIPAA allows protected health information (PHI) to be disclosed in certain situations without the patient's authorization, but requires ANTHC to provide patients with a disclosure log so that they may know who has received their PHI.

What are some common disclosure that MUST be logged? Common disclosures that need to be logged are those disclosures made:

- To satisfy a mandatory reporting obligation, such as reports from social workers or providers to the Office of Children's Service (OCS) or Adult Protective Services (APS)
- To petition for a protective order under Title 47
- To law enforcement or other officials in order to report a crime or avert a serious threat to health or safety

Are their exclusions to the log requirement? Yes, there are many types of disclosures that do not need to be logged. **Disclosures that do NOT need to be logged are those:**

- For treatment, payment, and healthcare operation purposes (TPO disclosures)
- To the individual patient or patient representative
- For directory purposes
- To persons involved in the individual's care (e.g., family members who are a part of the care team or communications during care conferences)
- For national security or intelligence purposes
- To correctional institutions or law enforcement officials about an individual in their custody
- Pursuant to an individual's authorization (e.g., a signed release of information or other permission)
- As part of a limited data set

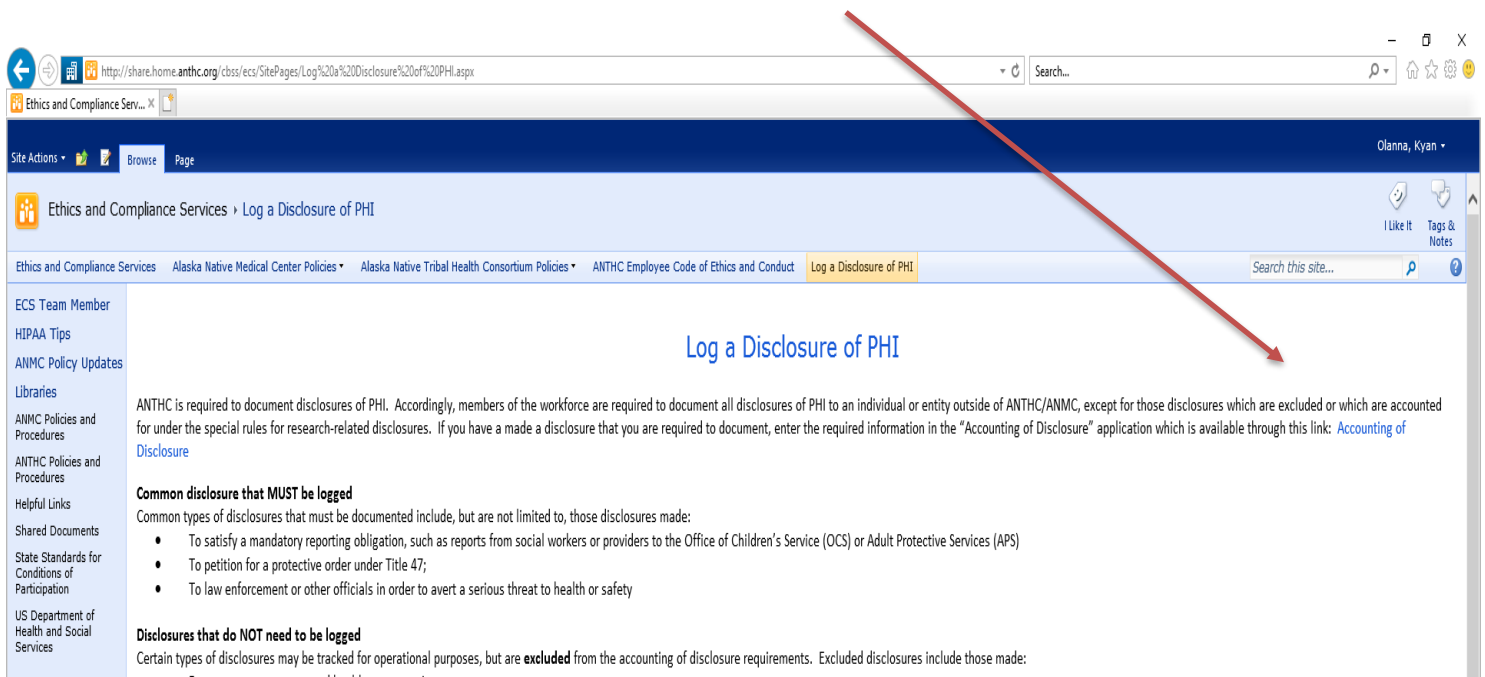
Also, many disclosures are tracked electronically or by HIM staff. Release of Information requests that are processed by Health Information Management (HIM) or submitted by ANTHC electronically do not need to be logged by other employees who are involved in that disclosure. Including disclosures:

- For purposes of public health activities (e.g., reporting of disease, injury, birth, or death, and for conducting public surveillance, public health investigations, and public interventions)
- To coroners, medical examiners, and funeral directors
- For cadaveric organ, eye, or tissue donation purposes
- For specialized government functions including military and veterans activities, national security and intelligence activities, protective services for the President of the United States and other public officials, correctional institutions and other law enforcement custodial situations



- Disclosures for judicial and administrative proceedings, including those made in response to a subpoena, court order, or other similar authority
- For workers’ compensation
- For health oversight activities, including audits, inspections, and oversight reviews
- To a business associate, except for purposes of the business associate providing treatment, payment, or healthcare operations activities on behalf of ANMC
- Unauthorized or accidental disclosures, such as a misdirected fax or email or release which was done based on invalid authorization

What do you need to do to make an entry? If you have disclosed PHI for a reason that requires logging, enter the required information electronically on the “Accounting of Disclosure” application which can be found on the ANMC or ANTHC intranet through the Corporate Compliance page or by searching “[Accounting of Disclosure](#).” There are directions on the intranet page. It is very simple and takes only a few minutes to complete.



Where can I get more information? These requirements are explained in more detail in the “**Accounting of Disclosure of Protected Health Information Procedure #1001-01**”, which is available on the ANTHC and ANMC Intranet. Feel free to email Chief Ethics and Compliance Officer Kyan Olanna (kolanna@anthc.org) with questions.

<http://share.home.anthc.org/cbss/ecs/SitePages/Home.aspx>
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