

**EMPLOYEE GROUP INSURANCE
TREATMENT OF PROTECTED HEALTH INFORMATION**

Section 4.8: Review of Requests for Use or Disclosure Requiring Approval by the Privacy Officer	Page: 1 of 1
Effective Date: April 14, 2003	

POLICY

EGI may Use or Disclose PHI only if such Use or Disclosure is permissible under the HIPAA Privacy Standards. Unless a Use or Disclosure is categorized as “routine” under Section 4.4(1) of this Policy, a request for Use or Disclosure must be approved by the Contact Person in consultation with the Privacy Officer.

4.8(1) Review of Intended Use or Disclosure of PHI

- a. Upon notification of an intended Use or Disclosure of PHI that is not deemed routine, the Contact Person shall determine if the information to be Used or Disclosed is PHI. If the information is PHI, the Contact Person shall determine whether the intended Use or Disclosure is a required Disclosure in accordance with Section 4.3 of this Policy or a permissible Use or Disclosure in accordance with Section 4.4 of this Policy or some other provision of this Manual.
- b. Upon a determination by the Contact Person that EGI must make a required Disclosure, or that EGI should make a permitted Use or Disclosure, the Contact Person shall, if the Privacy Officer was not involved in the determination, as soon as administratively practicable, communicate the determination to the Privacy Officer, and upon approval of the Privacy Officer, communicate the determination to the individual who requested it.
- c. If the determination is not approved by the Privacy Officer, the Privacy Officer shall make a determination as to the requested disclosure as required by this Manual, the System Administration’s applicable policies and procedures and the HIPAA Privacy Rules which shall be communicated to the requesting individual as soon as administratively practical.
- d. The communication must inform the individual either that the Use or Disclosure can be made; or, if the information cannot be Disclosed, inform the requestor that to make such Use or Disclosure, an Authorization from each individual who is a subject of the PHI must first be obtained.