

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

Section 4.14: Documentation of Disclosures	Page: 1 of 2
Effective Date: April 14, 2003	

POLICY

The HIPAA Privacy Standards require documentation to enable EGI to respond adequately to an individual's request for an accounting of disclosures. Any Disclosure of PHI by EGI that requires documentation shall be documented in the individual's designated record set by use of the form Disclosure Log in the Appendix to this Manual. The Documentation must include: (i) the date of the Disclosure; (ii) the name and, if known, address of the person who receives the PHI; (iii) a brief description of the PHI Disclosed; (iv) a brief statement of the basis of the Disclosure; (v) if the Disclosure is done pursuant to a written request, that written request; and (vi) a copy of, or a reference to, any other documents considered by the Privacy Officer in approving the request; all of which shall be maintained as required by Section 9.2 of this Manual. The following chart lists the documentation requirements for the categories of disclosures contained in this Policy:

Category of Disclosure	Documentation
Disclosure to the Individual	No
Disclosure to a Personal Representative	Yes
Secretary Inspection	Yes
Under an Authorization	No
Payment	No
Health Care Operations	No
Another Covered Entity	No
Required by Law	Yes
Judicial or Administrative Proceedings	Yes
Public Health Activities	Yes
Limited Data Set	No
Notification Disclosures	No
Imminent Threat to Health or Safety	Yes
Health Oversight Activities	Yes
Workers' Compensation	Yes
Law Enforcement Purposes	Yes
Coroners and Medical Examiners	Yes

Funeral Directors	Yes
Required by Military Authority	Yes
National Security Activities	No
Incidental Disclosures	No
Any other Disclosure, whether intentional or unintentional	Yes

REFERENCES/CITATIONS

45 CFR §§ 164.502(b), 164.514(d)(3)(i) and 164.530(j)