

Bethany Life Communities	Date Written: 2-24-2003	Date Revised: 5-1-2009
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Policy Statement

Residents have the right to receive an accounting of disclosures of protected health information (PHI) made by Bethany Life Communities.

Policy Interpretation and Implementation

1. A resident or her/his representative may request an accounting of disclosure of her/his protected health information (PHI) made by Bethany Life Communities during a specified time period for up to six (6) years prior to the date of the request of an accounting except for the following disclosures:
 - a. To carry out treatment, payment, or healthcare operations (TPO) as permitted under current law;
 - b. To the resident about her/his own information;
 - c. For the Bethany Life Communities directory;
 - d. To persons involved in the resident's care;
 - e. For national security purposes;
 - f. Pursuant to the resident's authorization;
 - g. To federal/state health department officials as permitted under current law; and
 - h. Disclosures that occurred prior to April 14, 2003.
2. Other than the exceptions noted above, the accounting record must include disclosures of PHI that occurred during the six (6) years (or shorter time period as is specified in the request) prior to the date of such request, including disclosures made by or to any of our business associates.
3. The content of the written accounting of disclosures record must contain, as a minimum, the following information:
 - a. Date of the disclosure;
 - b. Name of entity or individual who received the PHI;
 - c. The address of the person receiving the PHI (if known);
 - d. A brief description of the PHI disclosed; and
 - e. A brief statement of the purpose of the disclosure that reasonably informs the resident of the basis for the disclosure, or in lieu thereof, a copy of the resident's authorization of the request for a disclosure.
4. If, during the time period for the accounting, multiple disclosures have been made to the same entity or individual for a single purpose, or pursuant to a single authorization, the accounting may provide the information as set forth in paragraph 3 above for the first disclosures made during the accounting period and the date of the last disclosure during the accounting period.
5. A resident's request for an accounting of disclosures of PHI must be provided to the resident or representative within sixty (60) days of each request. If unable to provide the accounting within the sixty (60) day time frame, a one time thirty (30) day extension may be provided if:
 - a. The resident is notified in writing of the delay;

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- b. The notice include the reason(s) why the delay is necessary; and
 - c. The notice includes the date the accounting will be provided.
- 6. The first accounting in any twelve (12) month period must be provided to the resident at no charge. A reasonable, cost-based fee will be charged for additional accounts within the twelve (12) months period. Residents will be provided with such cost information (e.g., paper, ink, and labor costs) in advance of filing the accounting of disclosure request to allow the resident an opportunity to withdraw or amend her/his request.
- 7. Bethany Life Communities will document and retain documentation, in written or electronic format, for a period of six (6) years, the following information:
 - a. A copy of all information included in eh accounting of disclosure of PHI;
 - b. A copy of all written accounting provided to the resident; and
 - c. The name and title of the person(s) receiving and processing the accounting request.
- 8. Policies and procedures regarding the process of verifying the identity and authority of persons seeking disclosures of a resident's PHI are outlined elsewhere.