



University of Connecticut Health Center

POLICY NUMBER 2003-13

March 20, 2009

POLICY: PERMISSION TO TREAT/ASSIGNMENT OF BENEFITS/AUTHORIZATION TO RELEASE MEDICAL/DENTAL INFORMATION/ACKNOWLEDGEMENT OF RECEIPT: NOTICE OF PRIVACY PRACTICES (PRIVACY & SECURITY OF PROTECTED HEALTH INFORMATION (PHI))

PURPOSE: To ensure proper documentation of patient acknowledgement of receipt of Notice of Privacy Practices.

SCOPE: Applies to all patients of UCHC, except for Correctional Managed Health Care patients as noted.

POLICY STATEMENT:

UCHC makes a good faith effort to obtain written acknowledgment of the patient's receipt of the Notice of Privacy Practices **section of the HCH901 form.**

1. Signing the HCH 901 Form:

At the time of first service delivery after April 14, 2003, and any revision date of UCHC's notice and as set forth below:

- a. Outpatient UCHC areas will require patients to sign form HCH901 every six months. **CMHC patients sign "Consent to Basic Treatment and Diagnostic Procedures" and "Authorization to Release Medical Information" sections only.** Any "new" patient to UCHC presenting to the outpatient areas will be required to sign at the time of their first visit. Returning patients will only be required to sign every six months.

In addition, the HCH901 will be signed **at each admission to an inpatient unit, to Same Day Surgery or to the Emergency Department,** and will be kept as part of that admission with one exception. Any patient who was physically able to sign the HCH 901 Form in the Emergency Department, who is then admitted to an inpatient unit, need not be asked to sign the form again.

If a patient is physically unable to sign the section titled "Acknowledgement of Receipt of Notice of Privacy Practices" at the time the signatures are required, the staff makes a good faith effort to obtain the patient's signature at a later date and document this on the form. If the patient refuses to sign this section, that is documented as well.

2. **Entering the signature dates into IDX:** Signature dates will be noted/*updated* in IDX and the HCH901 form will be retained in the patient's medical/dental record.
 - a) Staff in the outpatient and ancillary areas will enter dates directly into the Registration application in IDX. Dates that have been entered by the Emergency Department staff for an ED patient, who is then admitted to an inpatient unit, will automatically populate the dates for the inpatient visit. For any staff that does not have this access, the Dept. of Patient Access/Registration must be contacted to enter the data.
 - b) Staff in the inpatient units will enter dates directly into the ADT application in IDX as the patient is admitted (in the "AD" function) or as soon as the patient is able to sign the form (in the "EV" function). Dates entered in the ADT application will be reviewed by the Financial Counselors and entered into the Registration application in IDX.
3. The signing of the acknowledgement of receipt of the Privacy Notice section of HCH901 is not a requirement for treatment, payment, or other health care operations. UCHC staff documents the individual's refusal to sign on the form. The refusal is documented in the "General Remarks" section of Registration database.
4. If the individual refuses to sign any other section of the form HCH901 (e.g. assignment of benefits), or requests restriction on how the protected health information is to be used, refer to the policy on the Patient Right to Request Restrictions on Use and Disclosure of Protected Health Information.

Reference: §164.520 Health Insurance Portability and Accountability Act of 1996 HCH901 Rev. 04/14/03 UCHC Policy #2003-14 Patient Right to Request Restrictions of Use and Disclosure of PHI

Pamela J. Carlson (signed)	4/06/09
_____ Associate Vice President for Patient Financial Services	_____ Date
Iris Mauriello (signed)	4/02/09
_____ Corporate Compliance Integrity/Privacy Officer	_____ Date
Cato T. Laurencin (signed)	4/03/09
_____ Vice President for Health Affairs	_____ Date

Revised: 03/20/09

Replaces: Policy dated 4/14/03, 4/15/04