

CCEMS
ADMINISTRATIVE POLICY 300-14
HIPAA POLICY ON DESIGNATED RECORD SETS

I. PURPOSE


- 1.1 To ensure that Coshocton County EMS released Protected Health Information (PHI) in accordance with the HIPAA Privacy Rule, this policy establishes a definition of what information should be accessible to patients as part of the DRS, and outlines procedures for requests for patient access, amendment, and restriction on the use of PHI.
- 1.2 Under the Privacy Rule, the DRS includes medical records that are created or used by CCEMS to make decisions about the patient.

II. POLICY

- 2.1 The DRS will only include HIPAA covered PHI and should not include information used for the operational purposes of the organization, such as quality assurance data, accident reports, and incident reports. The type of information that should be included in the DRS is medical and billing records.

III. PROCEDURE

- 3.1 The DRS for any requests for access to PHI includes the following records:
 - 3.1.1 The patient care report or PCR created by clinical personnel (this includes any photographs, monitor strips, Physician Certification Statements, Refusal of Care forms, or other source data) that is incorporated and/or attached to the PCR.
 - 3.1.2 The electronic claims records or other paper records of submission of actual claims to Medicare or other insurance companies.
 - 3.1.3 Any patient-specific claim information, including responses from insurance payers, such as remittance advice statements, Explanation of Medicare Benefits (EMOBs), charge screens, patient account statements, statements or records from attending or receiving or caring physician or other medical professionals involved with and knowledgeable about the patient's care and signature authorization and agreement to pay documents.
 - 3.1.4 Medicare Advance Beneficiary Notices, notices from insurance companies indicating coverage determinations, documentation submitted by the patient, and copies of the patient's insurance card or policy coverage summary, that relate directly to the care of the patient.
 - 3.1.5 Amendments to PHI, or statements of disagreement by the patient requesting the amendment when PHI is not amended upon request, or an accurate summary of the statement of disagreement.
- 3.2 The DRS also includes copies of records created by other service providers and other health care providers such as first responder units, assisting ambulance services, air medical services, nursing homes, hospitals, police departments, coroner's office, etc., that are used by CCEMS as part of treatment and payment purposes related to the patient.

Director: 

Effective: 11/05/2008

Reviewed: _____

Revised: _____