PURPOSE:
To facilitate the patient’s right to request a restriction on the use and disclosure of PHI for treatment payment or health care operations. Exceptions to this right include psychotherapy notes, information compiled for use in civil, criminal or administrative actions, and information that is subject to prohibition by CLIA.

POLICY:
A. Patients of Student Health Services (SHS) may submit a written request to restrict the use and/or disclosure of PHI by completing Request Form for Restriction(s) on Use and Disclosure of Health Information.
B. The completed form will be reviewed by:
   a. If the request is for confidential billing: The request will be reviewed and approved or denied at the point of service (Ex: RN, NP, MD, Business Office)
   b. Any other requests for restrictions:
      i. Medical information: Associate Director/Chief of Staff
      ii. Billing/Payment information: Associate Director/Admin. Operations.
C. The request must be thoroughly investigated in order to determine SHS ability to consistently comply with the request.
D. If the request is accepted:
   a. The patient must be notified in writing. This notice must include the information that the restriction will not apply in emergency treatment situations.
      i. Confidential billing: the patient should be given a copy of the completed form at the point of service.
      ii. Other requests: patient will be notified via written response from Chief of Staff or Associate Director.
   b. The patient’s records must be flagged to ensure compliance.
E. An agreement to a restriction may be terminated if:
   a. The patient agrees to or requests the termination in writing.
   b. The patient orally agrees to termination and oral agreement is documented.
   c. SHS may unilaterally terminate the restriction if it informs the patient in writing. Such termination is only effective with respect to PHI created or received after the patient has been informed.
F. If the request is denied:
   a. The patient must be notified in writing.
b. Documentation of the request and denial must be retained in the patient record.