HIPAA Privacy Rule PAT-605: Patient Requests to Receive Confidential Communications

I. Policy

It is USC’s¹ policy to accommodate a reasonable request by a patient to receive communications of Protected Health Information² from USC by alternative means or at alternative locations, provided the procedures for requesting such accommodations as set forth below, are followed.

II. Procedures

A. A patient must make a request to receive communications of Protected Health Information by alternative means or at alternative locations, in writing, using USC’s Request to Receive Confidential Communications Form, which is available at the HIPAA webpage on the USC policy website: https://policy.usc.edu/hipaa/.

B. All such requests should be submitted to the relevant clinic department manager, or if at the hospitals, Patient Experience, Hospital Admitting or Health Information Management.

C. USC may condition its accommodation of the individual’s request on whether:

   1. the individual has provided the clinical unit with information as to how payment, if any, will be handled (e.g., requests that bills or explanation of benefits information be sent to a business address instead of the home address); and

¹ For purposes of the HIPAA Privacy Rule, USC includes those entities that comprise Keck Medicine of USC, including but not limited to, USC Norris Cancer Hospital, Keck Hospital of USC, USC’s employed physicians, nurses and other clinical personnel, those units of USC that provide clinical services within the Keck School of Medicine, School of Pharmacy, the Herman Ostrow School of Dentistry, Physical and Occupational Therapy as well as the Keck Doctors of USC, USC Care Medical Group, affiliated medical foundations of Keck and their physicians, nurses and clinical personnel, USC Verdugo Hills Hospital, its nurses and other clinical personnel, Verdugo Radiology Medical Group, Verdugo Hills Anesthesia, and Chandnish K. Ahluwalia, M.D., Inc. and those units that support clinical and clinical research functions, including the Offices of the General Counsel, Audit and Compliance.

² Protected Health Information is defined as identifiable information that relates to the individual’s past, present or future physical or mental health condition or to payment for health care.
2. the individual has specified an alternative address or other method of contact (e.g., requests that appointment notices be sent to business address instead of home address).

D. USC may not require an explanation from the individual as to why he/she is requesting that communications of Protected Health Information be received by alternative means or at alternative locations.

E. Any accommodation should be maintained in the record of the patient and a copy should be provided to all relevant individuals within the clinical unit who would be responsible for implementing the accommodation.

F. If the request does not fall within what is permitted under this policy, a representative from the clinical unit or should so notify the patient.

Additional References

45 CFR 164.522(b)

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