SEPTEMBER 2014 - PATIENT REQUEST TO RESTRICT THE USE AND DISCLOSURE OF INFORMATION

REMINDEr: PATIENT RIGHT TO RESTRICT INFORMATION SENT TO THEIR HEALTH INSURANCE PLAN!

Patient Request to Restrict the Use of Information:

Under the Final OMNIBUS Rule released by Health and Human Services (HHS) on January 23, 2013, VUMC is required to permit individuals to request restrictions on uses or disclosures of their protected health information (PHI) to their health plan if:

- The disclosure is for the purpose of carrying out payment or health care operations and is not otherwise required by law; and
- The PHI pertains solely to a health care item or service for which the individual, or person on behalf of the individual other than the health plan, has paid the covered entity in full.

What to do if your Patient Requests a Restriction:

- Clarify if patient is asking for their health plan to **NOT BE MADE AWARE OF** the service OR if the patient is simply requesting to not bill insurance.
- If the patient is requesting insurance to be restricted from obtaining information about the service, **notify a financial counselor or registration staff member for direction.**
- If the patient is requesting to simply not bill insurance follow normal self-pay processes.
- Emergency Department patients will have the discussion only after the EMTALA medical screening has been completed.
- If your patient requests to revoke a previous request for restriction, Vanderbilt needs to obtain the patient’s signature in the revocation section of the “Restriction on Release of Information to Insurance Plan Agreement” document so notify a financial counselor or registration staff member for direction.

Remember:

A patient may make the request for a Restriction for Release of Information to their Health Insurance Plan at any time (not just during the registration process).

- All requests for a “restriction” are to be communicated to a specially trained core group for implementation.
  - **Clinic encounters:** contact VMG Business Office Financial Counselors
  - **Emergency Dept. encounters:** contact the Emergency Dept. Registration Supervisor
  - **Inpatient admission or Outpatient Procedure:** contact the Emergency Dept. Registration Supervisor
  - **Psychiatric Hospital admission:** contact the Hospital Registration Specialist
- **A Restriction of Release of Information to Insurance Plan Information Agreement** will need to be presented to the patient and signed before a treatment encounter begins if possible and a deposit will be collected.

IM 10-30.08  Patient Requests to Restrict the Use and Disclosure of Information