PROTECTED HEALTH INFORMATION MANAGEMENT TOOL (PHIMT)

HIPAA Privacy ◆ August 2010

I. Background

The Privacy Rule of the Health Insurance Portability and Accountability Act (HIPAA) of 1996 requires a Covered Entity (CE) to track when and to whom disclosures of Protected Health Information (PHI) are made. The Military Health System (MHS) and military treatment facilities (MTFs) are, by definition, CEs. Therefore, the MHS must be able to provide an accounting of those disclosures to an individual upon request.

To comply with disclosure requirements, the TRICARE Management Activity (TMA) deployed an electronic disclosure-tracking tool. The Protected Health Information Management Tool (PHIMT) tracks and maintains information about disclosures. It also allows users to input information regarding PHI authorizations, and restrictions that are made for a particular patient. The PHIMT can be accessed at: https://tma-phimt.csd.disa.mil/hipaax.

II. Definitions

1. Accounting of Disclosures: This is a combined report of all disclosures made about a patient.

2. Authorization: This document permits a CE to disclose a patient's PHI.

3. Disclosure: This is the sharing or release of PHI in any manner outside the CE.

4. Restriction: Allows members to restrict uses and disclosure of their PHI. A restriction refers to a constraint put upon a particular disclosure activity. The constraint could refer to denying access to a particular individual or a particular time frame.

III. PHIMT Features

1. Authorizations: The PHIMT can be used to record an Authorization by the patient when there is an exchange of PHI that occurs outside of the treatment, payment or health care operations.

2. Complaints: The PHIMT can be used to record all HIPAA-related complaints against a CE. It can also record all outcomes of the complaint.

3. Letter Generation: The PHIMT allows users to generate letters to correspond with patients.

These letters include:

    a.   Approved/Denied Disclosure Report

    b.   Substantiated/Unsubstantiated Complaint

    c.   Approved/Denied Alternative Address

4. <u>Reporting and Correspondence Generation:</u> PHIMT has a functionality built into it that can provide an accounting of disclosures, when requested.

5. <u>Restrictions:</u> The PHIMT can be used to enter a Restriction of a Disclosure or when a Restriction of Disclosure is terminated.

6. <u>Roles and Permissions:</u> PHIMT assigns permissions based on workflow and authorities of the job position. For example, a "Regular User" enters the disclosure into the system and then routes it electronically through PHIMT for approval by the "Privacy Specialist," i.e., MTF HIPAA Privacy Officer.

7. <u>Suspensions:</u> An individual's right to receive an accounting of disclosures can be suspended for two types of disclosures: (a) to law enforcement officials, and (b) to health oversight agencies. Once a suspension has been entered, all users can view it.

8. <u>Workflow:</u> PHIMT allows users to create multiple workflows, which are requests that are routed in order to accommodate various types of PHI disclosures, restrictions and authorizations.

IV. <u>Additional Resources</u>

1. TMA Privacy Office Web Site
   http://www.tricare.mil/tma/privacy/default.aspx

2. PHIMT Technical Assistance
   mhssc@timpo.osd.mil

3. Privacy Mail (for questions pertaining to policy)
   privacymail@tma.osd.mil

4. TMA Privacy Office E-News
   http://www.tricare.mil/tma/privacy/mailinglist.aspx

5. HIPAA Service Representatives