

Protected Health Information Management Tool (PHIMT)

November 2024

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.

PHIMT is a comprehensive tool designed to manage and comply with all major HIPAA Privacy requirements by storing, processing, and maintaining data and documents related to a wide range of HIPAA Privacy provisions. The tool includes extensive workflows and functionality for essential aspects such as patient releases of information, authorizations, DD2870 Authorizations disclosures with an opportunity to agree or object, accountable disclosures, privacy restrictions, confidential/alternative communications, PHI access, disclosure accounting, accounting suspensions, HIPAA privacy complaints, and other HIPAA Privacy and ROI requirements.

In addition to its robust HIPAA Privacy features, PHIMT boasts a range of enterprise features designed to enhance efficiency and usability. These include user task workflow and routing, electronic document management and storage, automated or on-demand document and form generation (DD2870, letters, reports), reporting at DHA, MTF, and user levels, automated email reminders, centralized data storage, disclosure imports from external systems or files, centralized system administration, DoD compliance, security and auditing, and user authorization and authentication.

II. Definitions

- A. **Accounting of Disclosures:** This is a combined report of all disclosures made about a patient.
- B. **Authorization:** This document permits a CE to disclose a patient's PHI.
- C. **Disclosure:** The release, transfer, provision of access to, or revealing in any other manner of PHI outside the entity holding the information of covered individual.

- D. **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:** 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:** 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
 - d. PHI Access 30 Day Delay Letter
4. **Reporting and Correspondence Generation:** PHIMT has a functionality built into it that can provide an accounting of disclosures, when requested.
5. **Restrictions:** PHIMT can be used to enter a Restriction of a Disclosure or when a Restriction of Disclosure is terminated.
6. **Roles and Permissions:** 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. **Suspensions:** 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. **Workflow:** PHIMT allows users to create multiple workflows, which are requests that are routed to accommodate various types of PHI disclosures, restrictions,

and authorizations.

IV. Additional Resources

1. <https://tma-phimt.csd.disa.mil/hipaax>
2. Sign up for PHIMT dha.ncr.solutiondeliv.list.sdd-ias-pmo@health.mil
3. Sign up for GovDelivery to receive
<https://public.govdelivery.com/accounts/USMHS DHSS/subscriber/new>

*If you have any questions about any of the information above, please contact the DHA PCLO at:
dha.ncr.pcl.mbx.hipaa-compliance-inquiries@health.mil*