

Request of Confidential Communications Policy and Procedure

POLICY:

It is the policy of Purdue University's covered health care providers to accept and accommodate reasonable requests by individuals to receive protected health information through alternative means or at alternative locations. Purdue's health plans will also accommodate reasonable requests by individuals to receive protected health information through alternative means or at alternative locations and may require that the individual clearly state that the disclosure of all or part of that information could endanger the individual.

PROCEDURE:

Health Care Providers:

Requests to Purdue's health care providers for receipt of protected health information through alternate means or at alternative locations are generally received verbally and accommodated on a single-event basis. A covered health care provider may not require an explanation from the individual as to the basis for the request as a condition of providing communications on a confidential basis. If the individual requests communication of confidential health information (e.g. treatment information, test results, medical device questions), via e-mail or text message, they should be advised to use the secure messaging system, if available in the electronic medical record or other system. If a secure messaging system is unavailable, the individual should be directed to call the facility. For communications related to non-medical matters, insurance account information, or bill payment questions, a response may be provided using e-mail or text message, if no PHI is included. If the original question from the patient includes PHI, the original message should be removed prior to responding. Communications requiring the disclosure of PHI should not occur through e-mail or text. Individuals should be asked to phone the covered component.

Health Plan(s):

Purdue's health plan(s) will accept verbal requests for confidential communications on a single-event basis. The health plans may require that all requests for confidential communications include a statement that disclosure of all or part of the information, to which the request pertains, could endanger the individual. If the individual requests communication of confidential health information (e.g. treatment information associated with a claim, health history or health status), via e-mail or text message, the individual should be directed to call the facility or use the secure messaging system. For communications related to non-medical matters, insurance account information, or bill payment questions (not including medical details), a response may be provided using e-mail or text message, if no PHI is included. If the original question from the patient includes PHI, the original message should be removed prior to responding.

Communications requiring the disclosure of PHI should not occur through e-mail or text. Individuals should be asked to phone the covered component.

Requests for confidential communications, that cannot be addressed by asking the individual to change their preferred address/phone in either the student or human resources information system, as appropriate, and other than on a single-event basis, shall be submitted in writing and will specify in detail an alternative address or other method of contacting the individual and how payment issues, if applicable, will be handled. These written requests will be referred immediately to the Office of Legal Counsel, who will determine which covered components are impacted by the request. The Office of Legal Counsel and affected HIPAA liaisons will determine whether the request is reasonable and can be accommodated. The Office of Legal Counsel will act upon a patient's/individual's request within thirty (30) days and will send a letter to the patient/individual stating whether the request can reasonably be accommodated and specify which covered components will comply with the request.