



Patient's Right to Request and Receive Confidential Communications Policy

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| Policy #: | HP012.1 |
| Policy Type: | University |
| Responsible Executive: | VPAA |
| Responsible Office: | Academic Affairs |
| Originally Issued: | November 8, 2023 |
| Latest Revision: | November 8, 2023 |
| Effective Date: | November 8, 2023 |

I. Policy Statement

The ULM Patient's Right to Request and Receive Confidential Communications Policy defines the duty of ULM providers and facilities to provide patients with mechanism to make reasonable requests to receive confidential communications by alternative means or at alternative locations of their Protected Health Information.

II. Purpose of Policy

To provide guidance to the health care facilities and providers affiliated with ULM on a patient's right to request to receive confidential communications by alternative means or at alternative locations of their Protected Health Information, as required by the Health Insurance Portability and Accountability Act, Standards for Privacy of Individually Identifiable Health Information (HIPAA Privacy Regulations), and any other applicable state or federal laws or regulations.

III. Applicability

This policy is applicable to all faculty and staff.

IV. Definitions

Protected Health Information (sometime referred to as "PHI") – for purposes of this policy means individually identifiable health information, that relates to the past, present, or future health care services provided to an individual. Examples of Protected Health Information include medical and billing records of a patient.

V. Policy Procedure

1.0 A patient may make a request in writing to ULM to receive communications of their Protected Health Information by alternative means or at alternative locations.

1.1 The patient cannot be required to provide an explanation for their request.

2.0 The request should be given to the Privacy Officer who will be responsible for receiving requests for confidential communications, and communicate it to the appropriate employees.

3.0 ULM is only required to handle requests that are reasonable. The reasonableness of a request must be determined by ULM solely on the basis of the administrative difficulty of complying with the request.

3.1 ULM may condition the provision of reasonable accommodation:

- when appropriate, information as to how payment, if any, will be handled and
- specification of an alternative address or other method of contact.

4.0 Examples of the types of communications subject to this policy include but are not limited to:

- A request by the patient that ULM communicate with the individual about their treatment at the individual's place of employment, by mail, or a designated phone number;
- Mailing or telephoning of appointment reminders to a particular location
- Sending prescription refill reminders to a particular address
- Mailing bills or statements to a particular address
- Request to send communications in a closed envelope rather than a postcard.

5.0 Requests for confidential communication must include the patient's designation of the means and location of alternative delivery of the PHI. For example, these requests may include, but not be limited to:

- Communication by telephone to an alternative phone number;
- Mail to an address other than the address of record;
- A request for only telephone communication;
- Sealed envelope delivery rather than a postcard; or
- Mail to an alternate address.

6.0 The patient must be informed:

- If ULM is not able to meet the request for confidential communications;
- The patient's request for confidential communication should be documented in the patient's medical and billing records and the original copy of the request form will be attached in the patient's medical record.

VI. Enforcement

The Vice President of Academic Affairs will be responsible for enforcement of this policy.

VII. Policy Management

The Vice President of Academic Affairs will be responsible for enforcement of this policy.

VIII. Exclusions

None

IX. Effective Date


This policy is effective upon the date signed by the University President.

X. Adoption

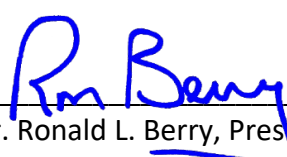
This policy is hereby adopted on this 8th day of November 2023.

Recommended for Approval by:

Approved by:



Dr. Mark Arant, VP for Academic Affairs



Dr. Ronald L. Berry, President

XI. Appendices, References and Related Materials

45 C.F.R. § 164.522(b) (1)

XII. Revision History

Original Adoption Date: November 8, 2023