THE RELEASE OF INFORMATION (ROI) PROCESS

LOGGING, TRACKING & VERIFYING REQUEST

1. Receive Request

2. Enter Request in ROI tracking software for Accounting of Disclosures

3. Is the request directed from the individual or his/her personal representative under HIPAA (78 FR 5566, 5635)?

3. Is the authorization valid?
- Is patient identifiable?
- Does the authorization contain the 6 core elements and 3 required statements of a HIPAA compliant authorization in accordance with 45 CFR 164.508(c)?

NO → 3a. Update Status in Software

3b.Reject auth - Send invalid authorization letter to requester

YES → **Continue to Step #4**

RETRIEVING PATIENT PROTECTED HEALTH INFORMATION

4. Search for Medical Record Number

5. Able to Locate Patient in the Master Patient Index?

YES → 6. Determine Format of PHI (Paper-Microfilm-Electronic)

Only 3.4% of all hospitals nationally are completely paperless so a hybrid record requires steps 7, 12 and 16.

NO →

5a. Search Secondary Systems

5b. Is the Protected Health Information (PHI) available?

NO → 5b1. Update status in ROI Tracking software

5b2. Send status letter to requester

YES → **Continue to Step #6**

7. Order Offsite record of PHI

8.Transport offsite record

9. Login Offsite PHI

10. PHI Retrieved?

NO → 10a.Report to HIM Manager

10b. Update status in ROI software

10c. Send status letter

YES → 11. Update Chart Locator if Needed

Continue to Step #12

12. Retrieve Onsite Paper PHI and billing records

13. Log into Patient Accounting system and extract itemized billing records or Order itemized Billing

14a. Retrieve Paper PHI. Is the paper record available?

NO → 14b.. log into chart locator and locate PHI

14c. Chart received

14d. Update Chart locator

YES → 15. Update Chart Locator to ROI area

Continue to Step #16

16. Retrieve Electronic PHI

16a.. Log In To Electronic Medical Record System(s)

16b. Is Electronic PHI available?

NO → 16c. Report to HIM Management

16d. Update status in ROI software

16e. Print & send Status letter to Requester

YES → 17. Extract PHI from the EMR

18. Upload to ROI software and Save Patient order

Continue to Step #19

PROTECTING SENSITIVE INFORMATION

19. Review every page/image of the PHI printed or downloaded ensuring pages scanned do not contain federally or state protected health information such as drug and alcohol, HIV, mental health.

20. If federally protected PHI is not authorized Reject the auth -update status in software

19a. If authorized proceed to step 22.

21. Send invalid authorization letter to requestor

22. Verify all pages and EHR images of PHI are the correct patient

23. Verify Dates of Service and Items Requested and Authorized

24. Scan Backup Set (Request & Authorization) into Tracking Software

25. Scan Paper PHI into tracking software as the Medical Records Set—Reassemble Chart Exactly as Found

26. Return Paper Chart to file/offsite storage/update Chart Loactor

27. Retrieve *Imaged PHI* and upload to the Medical Records Set

Continue to Step #28

RELEASING AUTHORIZED INFORMATION

28. Match paper and electronic PHI with Request to confirm proper patient by checking SS#, date of birth, confirm proper treatment records of PHI is released based on diagnosis (car accident, slip and fall, heart attack, etc.)

29. Perform quality review to ensure all PHI is included as authorized

NO → 29a. Notify HIM Management

29b. Notify Requester

29c. Update status in ROI tracking software

29d. Send status letter

YES →

30. Confirm ALL Pages Oriented Correctly? Fall within the Date Range Requested and Authorized? Are they the Types of Records Requested and Authorized?

31. Flip, Delete, Scan PHI as Needed to Fulfill Request Correctly

Continue to Step #32

COMPLETING AND INVOICING THE REQUEST

On Site Release

32. Does Requester Require a Fee Approval?

YES → 32a. Verify Fee per state rate, select charge type, Generate Fee Approval Notice

32b. Send Fee Approval Notice

NO → 33. Verify state rate, apply payment that accompanied request

34. Generate Invoice and print PHI

35. Compare Patient Name on Last Page of all PHI with Invoice Page, perform mail QA

36. Attach Any Supplemental Info: Affidavit, Certification, etc

37. Place Completed Documents in Appropriate Envelope. Place in Mail Out Bin

Return to Step #1

Centralized Processing

38. Review Every Page of the PHI : Ensuring Pages Scanned are Oriented Properly, Fall within the Dates of Service Requested and Authorized, are the Correct Type of PHI requested and Authorized ALSO Verify Correct Patient Name on EVERY Page of the PHI

39. Are all pages of the PHI on the patient available and correct?

NO → 39a. Notify Site to be corrected

40. Correct Name on ALL Pages?

NO → 39b. Print Wrong Patient Pages, Notify Site, Fax to Site and File

YES → 41. **Follow step #33 to #37**

42. Alternately Stack Document Set to be Verified and Mailed

43. Compare Patient Name on Last Page of PHI with Invoice Page, Double Check Mailing Address against 1st Page of Backup-Verify All Supplemental Info is Attached. Place in Appropriate Envelope and Place in Mail Out Bin

44. Mail PHI