Protected Health Information Management Tool (PHIMT)

Privacy Specialist Version 3.0 April 2011





PHIMT

Training Objectives

- Upon completion of this training you should be able to:
 - Identify the use of the PHIMT in meeting the Accounting of Disclosures requirement of the HIPAA Privacy Rule
 - Describe the necessary policies and procedures
 - Describe and perform all Privacy Specialist functionality
 - Describe and interpret the data that the PHIMT can provide for compliance measurement
 - Implement PHIMT at your facility









Introduction to PHIMT Objectives

- Upon completion of this training you should be able to:
 - Explain what the PHIMT is and why it exists
 - Describe the capabilities of the PHIMT
 - Identify the advantages of using the tool
 - Identify the 14 Permitted Uses and Disclosures
 - Describe the PHIMT terminology, user roles, and permissions
 - Explain the PHIMT Hierarchy





Introduction to PHIMT What is the PHIMT?

- The PHIMT is a web-based application that assists in complying with the HIPAA Privacy Disclosure Accounting Requirement
 - Commercial Off-The-Shelf (COTS) product customized for Defense Health Agency (DHA)
 - Deployed in October 2003 with a series of training supporting the deployment to the Military Treatment Facilities (MTFs)
 - Centrally managed application that is accessed via the Internet





Introduction to PHIMT Why Does the PHIMT Exist?

HEALTH AFFAIRS

- The HIPAA Privacy Rule requires a Covered Entity (CE) to maintain a history of when and to whom disclosures of protected health information (PHI) are made for purposes other than treatment, payment and healthcare operations (TPO)
- Individuals have the right to receive an accounting of disclosures of PHI made by the CE
- The Military Health System (MHS) must be able to provide an accounting of those disclosures to an individual upon request
 - Not required to account for disclosures that occurred prior to the April 14, 2003 compliance date
- To comply with this requirement, Defense Health Agency provides an electronic disclosure-tracking tool



Introduction to PHIMT Tool Capabilities

- The tool enables users to:
 - Track PHI Requests or Release of Information
 - Maintain authorizations
 - Track complaints

HEALTH AFFAIRS

- Create an automated workflow process developed by the users
- Create pre-defined requesters from organizations
- View the details about the information disclosed
- It allows users to track disclosures, document requests for amendments and authorizations, document complaints and restrictions to PHI



Introduction to PHIMT Advantages of the PHIMT

- Consolidates multiple tasks into one electronic environment
- Web based, centrally managed system
- Over 2000 users worldwide
- Protects the data
 - Allows for role-based access in maintaining the records and accessing patient information
 - DISA Protected Enclave
 - Defense Information Assurance Certification and Accreditation Process (DIACAP) certified
- Pre-populated drop-down fields
- Streamlined disclosure process

Multiple Disclosure Accounting



14 Permitted Uses and Disclosures (1 of 2)

- Permitted Uses and Disclosures
 - For the permitted uses and disclosures listed below, a patient's opportunity to agree or object is not required
 - 1. As required by law
 - 2. Avert serious threats to health or safety
 - 3. Specialized government functions
 - 4. Judicial and administrative proceedings
 - 5. Medical facility patient directories
 - 6. Cadaver organ, eye or tissue donation purposes
 - 7. Victims of abuse, neglect or domestic violence





14 Permitted Uses and Disclosures (2 of 2)

- Permitted Uses and Disclosures
 - For the permitted uses and disclosures listed below, a patient's opportunity to agree or object is not required
 - 8. Inmates in correctional institutions or in custody
 - 9. Workers' compensation
 - 10. Research purposes
 - 11. Public health activities
 - 12. Health oversight activities
 - 13. About decedents
 - 14. Law enforcement purposes





Key PHIMT Terminology

- User an individual assigned to an organization within the tool
- Organization a logical or physical entity such as an MTF, a Service or ÖPA
- Role a named collection of permissions within the tool
 - A user can have the same roles in multiple organizations, or different roles in multiple organizations





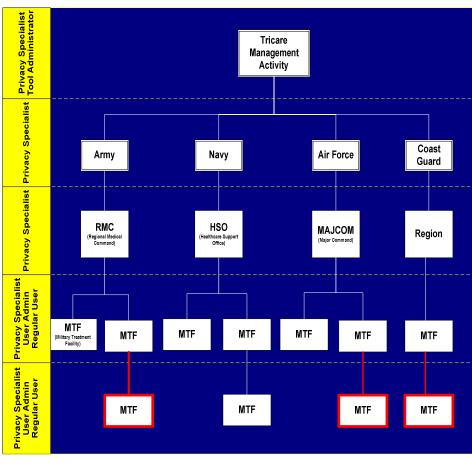
Introduction to PHIMT User Roles and Permissions

- <u>User Admin</u> is a local admin for an MTF or a designated Service.
 This role may be handled by the email account administrators for each MTF or Service
- <u>Privacy Specialist</u> is the Privacy Officer or designee at an MTF or Service level. This role allows the user to maintain disclosure reporting, approve/deny disclosure requests, amendments to requests, restrictions to disclosures, disclosure suspensions and generate associated letters
- Regular User is a general role with basic functionality. This role can create disclosures and authorization requests that can be routed on to a Privacy Specialist

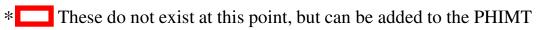




Introduction to PHIMT Hierarchy









Introduction to PHIMT Summary

- You should now be able to:
 - Explain what the PHIMT is and why it exists
 - Describe the capabilities of the PHIMT
 - Identify the advantages of using the tool
 - Identify the 14 Permitted Uses and Disclosures
 - Describe the PHIMT terminology, user roles, and permissions
 - Explain the PHIMT Hierarchy





Privacy Specialist Functionality





Privacy Specialist Functionality **Objectives**

- Upon completion of this training you should be able to:
 - Perform the Patient Search
 - Approve/Deny a Request for Disclosure/Accounting of Disclosures
 - Record a Disclosure/Accounting of disclosures
 - Amend a disclosure
 - Create a suspension
 - Record a restriction
 - Generate correspondence
 - Create/sign/revoke an authorization
 - Record a complaint





Privacy Specialist Functionality Common Access Card

- The PHIMT is Common Access Card (CAC) enabled
- All users must have a CAC in order to login to the PHIMT

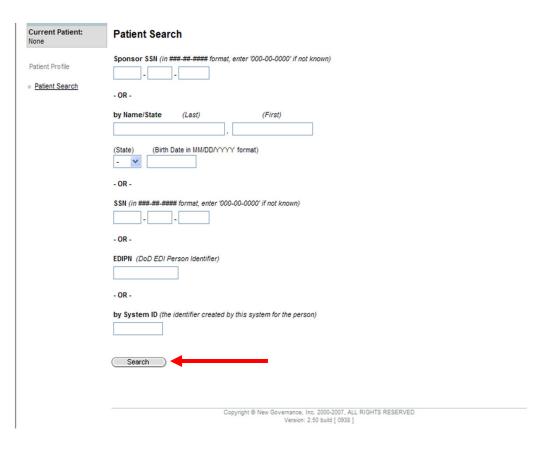




Privacy Specialist Functionality Patient Search (1 of 4)

The first step of all patient activities in the PHIMT is the patient search

- 1. Select the Patient Tab
- Enter the patient search criteria
- Click on the Search button







Privacy Specialist Functionality Patient Search (2 of 4)

<u>NOTE</u>: The search limitation within the PHIMT is 600 records. This means that if your search results in over 600 records you must narrow your search

Current Patient: None	Patient Search Error(s) have occurred:
Patient Profile	 Too many results (over 600) match your search criteria, please change or provide additional criteria and resubmit.
Patient Search	Sponsor SSN (in ###-## format, enter '000-00-0000' if not known)
	by Name/State (Last) (First)
	(State) (Birth Date in MM/DD/YYYY format)
	- OR - SSN (in ###-### format, enter '000-00-0000' if not known)
	- OR -
	EDIPN (DoD EDI Person Identifier)
	- OR -
	by System ID (the identifier created by this system for the person)
	Search
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Privacy Specialist Functionality Patient Search (3 of 4)

- 4. Enter additional search criteria (if applicable)
- 5. Select the patient from the Patient Search Results screen







Privacy Specialist Functionality Patient Search (4 of 4)

The Patient Summary Screen appears and the current patient is displayed in the status box







Privacy Specialist Functionality Approving/Denying a Request (1 of 4)

HEALTH AFFAIRS

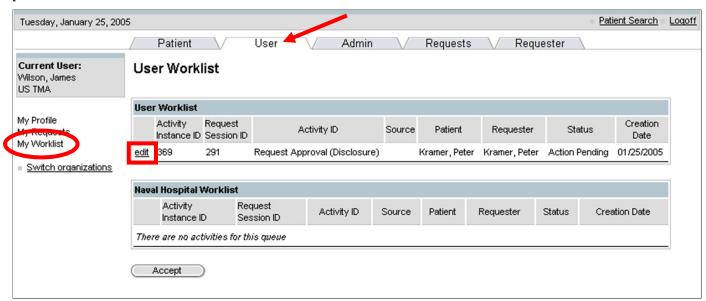
- Once a request for an accounting of disclosures has been recorded, a Privacy Specialist must approve or deny the request
- Once routed, the request will display in the Privacy Specialist's worklist
- Once a Regular User routes a request for disclosure to the Privacy Specialist, the request will display in the Privacy Specialist's worklist
- The Privacy Specialist will then approve or deny the request

NOTE: Those disclosures recorded by the Privacy Specialist using the Record Disclosure hyperlink have already been approved. This approval activity is for those disclosures that were developed using the Record Disclosure wizard and routed to the Privacy Specialist's worklist for later action



Privacy Specialist Functionality Approving/Denying a Request (2 of 4)

- Select the User Tab
- 2. Select the My Worklist hyperlink
- Select the Edit hyperlink for the disclosure you want to approve

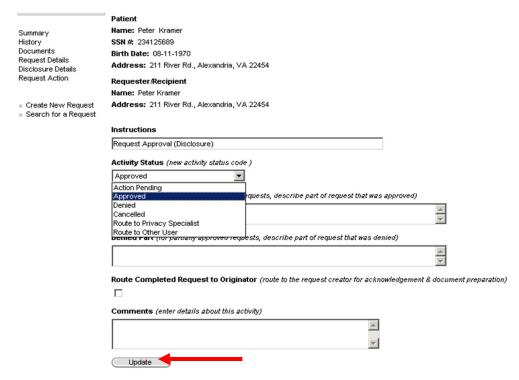






Privacy Specialist Functionality Approving/Denying a Request (3 of 4)

- 4. Select Approved from the Activity Status drop-down box
- 5. Click on the Update button



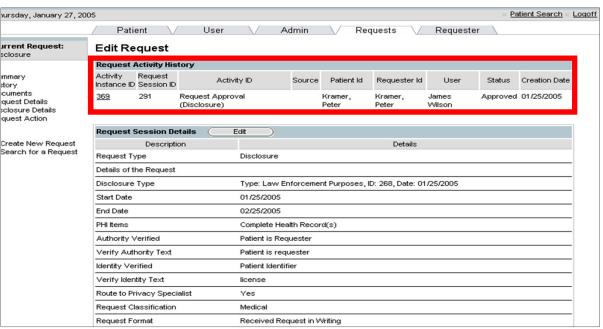




Privacy Specialist Functionality Approving/Denying a Request (4 of 4)

 The Edit Request screen appears. The approved request will display in the Request Activity History box. The status has been changed to Approved

<u>NOTE</u>: The request is no longer shown in your User Worklist







Privacy Specialist Functionality Recording a Disclosure (1 of 9)

- The Privacy Specialist will record the disclosure using the same steps that the Regular User would use
 - Privacy Specialists have the ability to record and approve disclosures in one step
- This eliminates the two step process of recording the request, routing it to their work list, and then approving the request





Privacy Specialist Functionality Recording a Disclosure (2 of 9)

- 1. Select the Patient Tab
- 2. Enter the patient search criteria
- 3. Click on the Search button
- 4. Select the patient from the Patient Search Results screen
- The Patient Summary screen appears

NOTE: The steps 1-5 for recording a disclosure are the same as steps 1-5 in the Patient Search section. Refer to the Patient Search section for screen displays of steps 1-5





Privacy Specialist Functionality Recording a Disclosure (3 of 9)

5. Select the Record Disclosure hyperlink on the Patient Summary screen

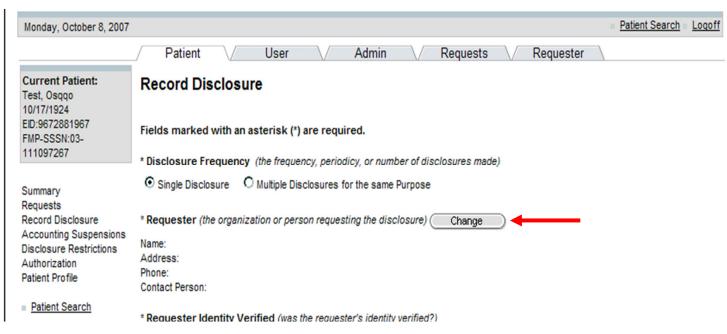






Privacy Specialist Functionality Recording a Disclosure (4 of 9)

- 6. Select the Disclosure Frequency radio button
- 7. Click on the Change button to change or update the requester







Privacy Specialist Functionality Recording a Disclosure (5 of 9)

8. Select the requester

Thursday, January 27, 200	05	Patient Search	Logoff
	Patient V User V Admin V Requests V Requester		
Current Patient: Smith, Joe J 07/05/1968 FMP-SSSN:20- 121131414	Requester Search Choose one of the following options: A. Select the Patient (the request is being made by the Patient themselves)		
Summary Requests Record Disclosure Accounting Suspensions Disclosure Restrictions Authorization Patient Profile Patient Search	Smith, Joe J Select B. Select a Third-Party Organization (a third-party requester, such as a law enforcement agency or ins	urance company)	
	Law Offices of Joe Gibbs, 1411 Jefferson Davis, Arlington, VA 20220 Select C. Search for a Person (search for another person, or add a new one*)	\supset	
	Name (Last) (First) An ** may be used as a wildcard. System ID (the identification number created by this system for the person)		
	☑ Include Pat		
	FMP-SSN (an external identifier for the person) ✓ Include No	n-Patient Records	
	Search	\supset	
	D. Search for an Organization (search for another organization, or add a new one*) Name (All or part of the name of the organization. An ** may be used as a wildcard.)		
	DMIS Code (the external identifier for the organization)		
	Search	\supset	





Privacy Specialist Functionality Recording a Disclosure (6 of 9)

9. Record the Disclosure details: requester authority, form, date, recipient, and disclosure type

NOTE: The disclosure description will automatically be populated when the disclosure type is selected

NOTE: All required fields are marked with an asterisk

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10. Select the Disclosure

Status from the drop-down
box

*Requester Identity Verified (was the requester's Identity verification was defined as 'other')

*Description of Requester Identity Verification (required if requester Identity verification was defined as 'other')

*Request Date (the disclosure request date in MM/DDYYYY format)

*IDIOB/2007

*Recipient (the organization or person where the disclosure went) Change

Name: Smith, Joe J
Address: 10D Beach Blvd., Isle Of Palms, SC 29450-1234

Phone: (803) 435-8789
Contact Person:

*Disclosure Type (the type of disclosure)

Inmates in Correctional institutions or in Custody

*Disclosure Description (a read-only description and example of the disclosure type selected above)

A correctional institution or a law enforcement official having lawful custody of an immate or other individual, If the correctional institution or such law enforcement official represents that such protected health information is necessary

**Disclosure Status (the status of the disclosure)

Cancelled
Complete

**Disclosure date in MM/DDYYYY format()
Undefined

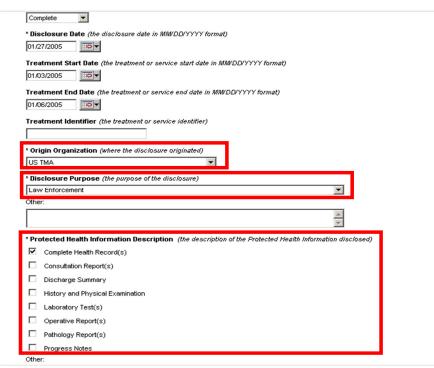
**Disclosure date in MM/DDYYYY format()
Undefined

**Disclosure date in MM/DDYYYY format()
Undefined



Privacy Specialist Functionality Recording a Disclosure (7 of 9)

11. Scroll down the screen and enter: disclosure date, origin organization, disclosure purpose, and PHI description







Privacy Specialist Functionality Recording a Disclosure (8 of 9)

12. Scroll down to the bottom of the screen and click on the Save button

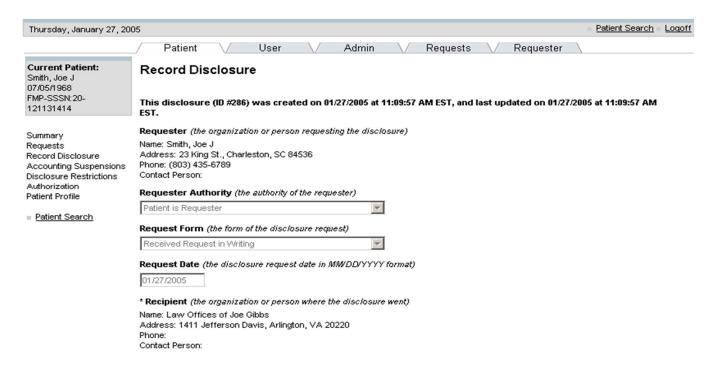
Laboratory resit(s)	
Operative Report(s)	
Pathology Report(s)	
☐ Progress Notes	
Other:	
A	
Disclosure Comments (the INTERNAL comments for this disclosure - these do NOT show up in the Pro Information disclosure report)	otected Health
_	
▼	
Improper Disclosure (checked if this disclosure occured improperly)	
Improper Disclosure Description (the details about the improper disclosure)	
A	
Improper Disclosure Mitigation (the details about how the improper disclosure was mitigated)	
_	
y	
Save	





Privacy Specialist Functionality Recording a Disclosure (9 of 9)

The disclosure is now complete and only the disclosure comments and improper fields can be updated







Privacy Specialist Functionality Amending Disclosures (1 of 5)

- A Privacy Specialist is authorized to label a disclosure as Improper
- Once a Disclosure status is marked as completed, it can only be amended by marking it as an Improper Disclosure
 - The disclosure was made incorrectly





Privacy Specialist Functionality Amending Disclosures (2 of 5)

- 1. Select the Patient Tab
- 2. Search for and select the patient

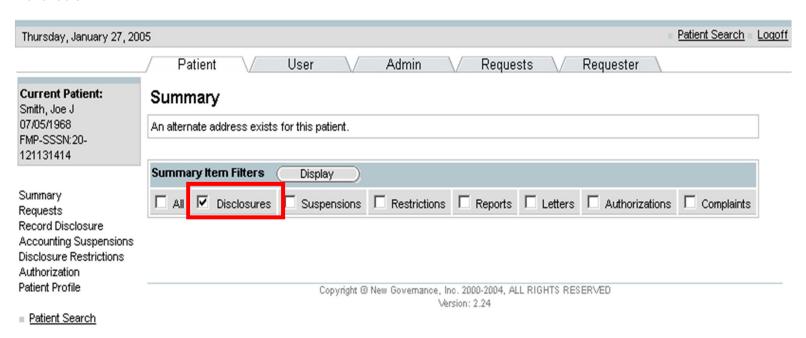






Privacy Specialist Functionality Amending Disclosures (3 of 5)

Place a check in the Disclosures box and click on the Display button

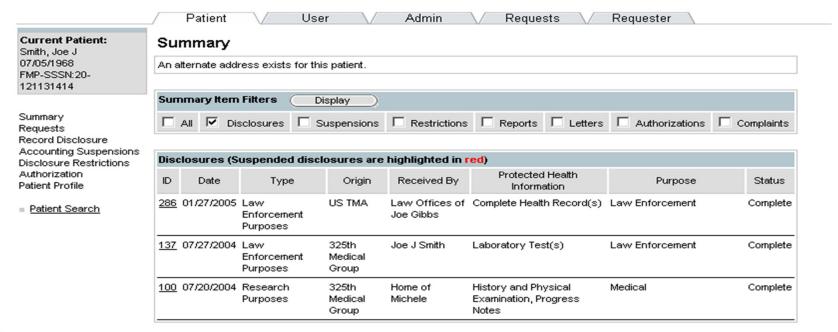






Privacy Specialist Functionality Amending Disclosures (4 of 5)

4. Select the ID hyperlink for the disclosure that you want to amend





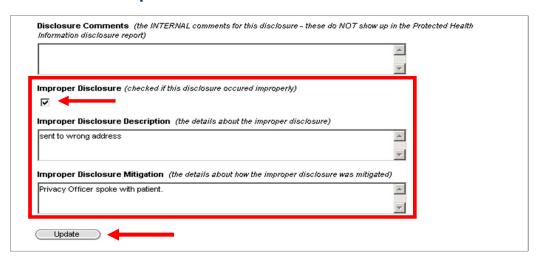


Privacy Specialist Functionality

Amending Disclosures (5 of 5)

The Record Disclosure screen will display

- 5. Scroll to the bottom of the screen and place a check in the Improper Disclosure checkbox
- 6. Enter a description of the Improper Disclosure and mitigation
- 7. Click on the Update button







Privacy Specialist Functionality Creating a Suspension (1 of 5)

- The CE shall temporarily suspend an individual's right to receive an accounting of disclosures to a health oversight agency or law enforcement official...DoD 6025.18-R C13.1.2.1
- Two types of disclosures can be suspended:
 - Law enforcement purposes
 - Health oversight activities
- Privacy Specialists have the ability to enter an accounting suspension in two ways
 - Specific disclosure (Recommended)
 - Type of disclosure



Once entered, the suspension can be viewed by all users



Privacy Specialist Functionality Creating a Suspension (2 of 5)

- Search for and select a patient record
- 2. Select the Accounting Suspensions hyperlink

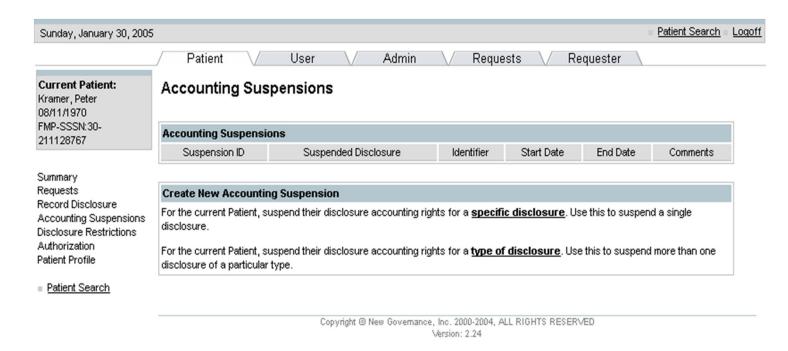






Privacy Specialist Functionality Creating a Suspension (3 of 5)

3. Select the Specific Disclosure hyperlink



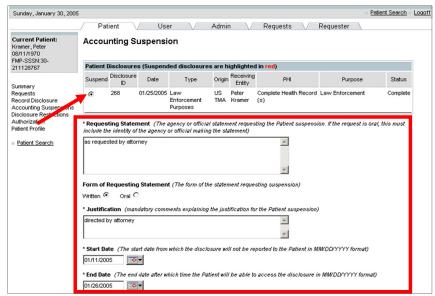




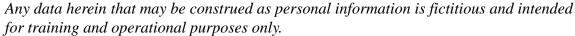
Privacy Specialist Functionality Creating a Suspension (4 of 5)

- 4. Click on the radio button for the disclosure you want to suspend
- 5. Enter the suspension details: requesting statement and form, justification, and start and end date

NOTE: All required fields are marked with an asterisk



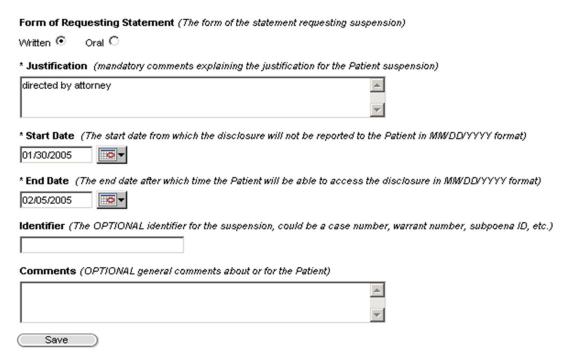






Privacy Specialist Functionality Creating a Suspension (5 of 5)

Scroll to the bottom of the screen and click on the Save button







Privacy Specialist Functionality Recording a Restriction (1 of 4)

- DoD 6025.18-R Chapter 10 describes the rights to request privacy protection for PHI
 - The CE is not required to agree to such requests
 - Requests may be made orally or in writing, but must be documented
 - The CE must provide a response to the individual
- Privacy Specialists can record and approve or deny requests for disclosure restrictions
 - Once approved or denied, a letter with an explanation can be generated





Privacy Specialist Functionality Recording a Restriction (2 of 4)

- Search for and select a patient record
- 2. Select the Disclosure Restrictions hyperlink







Privacy Specialist Functionality Recording a Restriction (3 of 4)

3. Click on the New button in the Disclosures Restrictions box

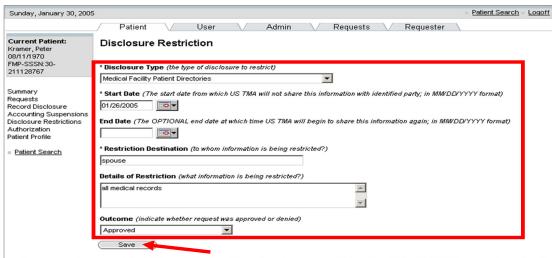




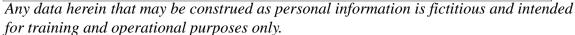


Privacy Specialist Functionality Recording a Restriction (4 of 4)

- 4. Enter the Disclosure Restriction details: disclosure type, start and end date, restriction destination (to whom information is being restricted) and details
- 5. Select Approved or Denied from the Outcome drop-down box
- Click on the Save button









Privacy Specialist Functionality **Generating Correspondence** (1 of 2)

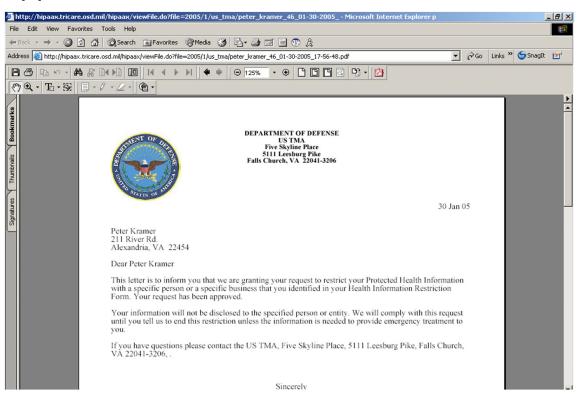
- Once you have approved or denied the disclosure restriction you have the ability to generate an approval or denial letter
- The letter will be pre-populated with the information that you entered for that particular restriction





Privacy Specialist Functionality **Generating Correspondence** (2 of 2)

The Approval letter







Privacy Specialist Functionality Creating an Authorization (1 of 5)

- The MHS uses the DD Form 2870 (Authorization for Disclosure of Medical or Dental Information)
- It authorizes an individual or organization to disclose a patient's medical or dental information
- Once an authorization has been created, the DD Form 2870 can be downloaded from the Privacy Office website, or from the DoD Forms website
- The form can also be generated using PHIMT





Privacy Specialist Functionality Creating an Authorization (2 of 5)

- Select the Patient Tab
- 2. Search for and select the patient record
- 3. Select the Authorization hyperlink

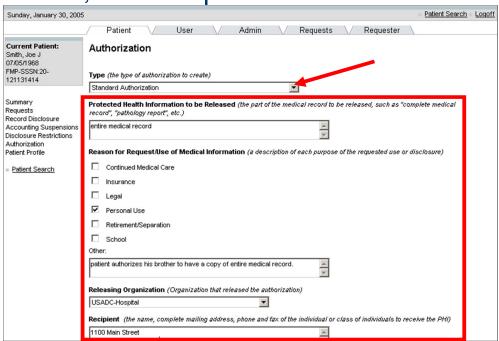






Privacy Specialist Functionality Creating an Authorization (3 of 5)

- 4. Select the Authorization Type from the drop-down box
- 5. Enter the Authorization Details: reason for request, releasing organization, and recipient

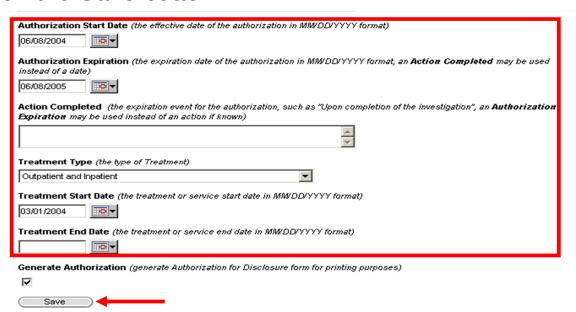






Privacy Specialist Functionality Creating an Authorization (4 of 5)

- 6. Scroll down the screen and enter: authorization start and expiration date, treatment type, and treatment start and end date
- 7. Place a check in the Generate Authorization checkbox
- 8. Click on the Save button



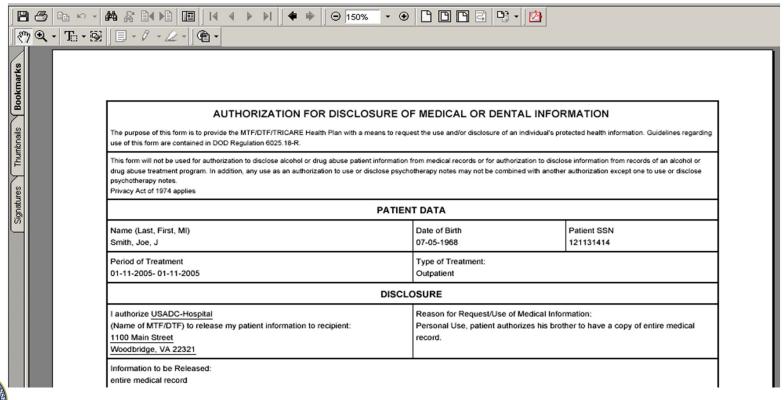


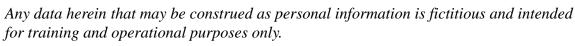


Privacy Specialist Functionality Creating an Authorization (5 of 5)

DD Form 2870 in Adobe Acrobat format

HEALTH AFFAIRS







Privacy Specialist Functionality Signing an Authorization (1 of 3)

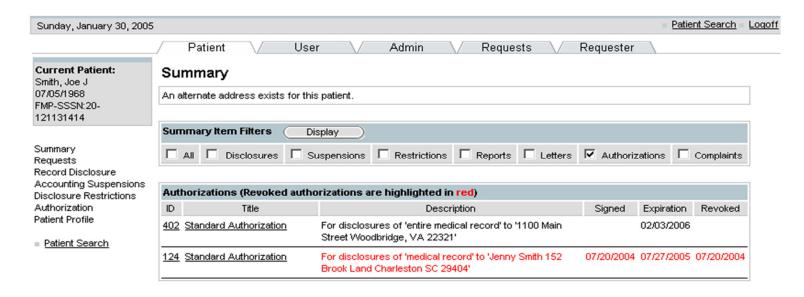
- Once an authorization has been entered, it needs to be signed by the patient for validation
- After the authorization is signed by the patient, a user has the ability to document the signature within the PHIMT





Privacy Specialist Functionality Signing an Authorization (2 of 3)

 Select the authorization ID hyperlink to access the detailed authorization record

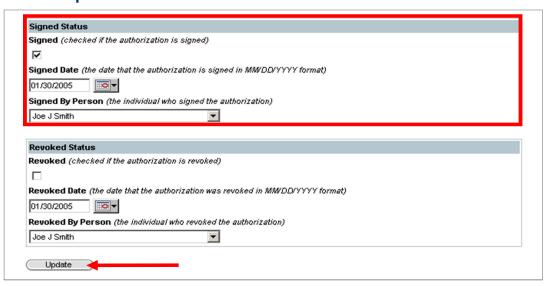






Privacy Specialist Functionality Signing an Authorization (3 of 3)

- Scroll to the bottom of the page to the Signed Status box
- 3. Place a check in the Signed Status checkbox
- 4. Select the date and the authorizing person's identity from the dropdown box
- 5. Click on the Update button







Privacy Specialist Functionality Revoking an Authorization (1 of 3)

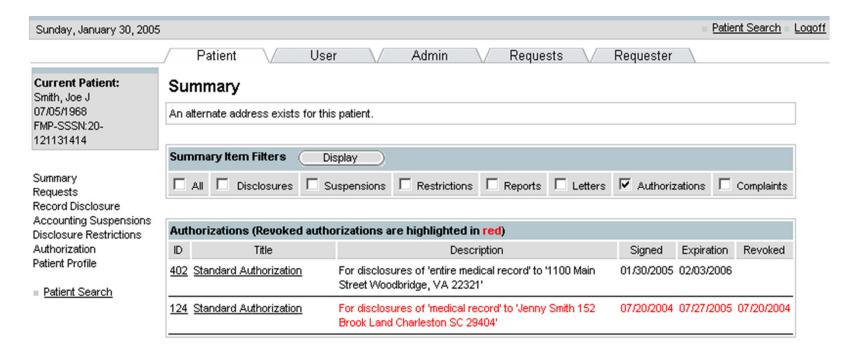
- DoD 6025.18-R, Section C5.2.5
- Privacy Specialists can revoke an authorization when instructed by a patient in writing
 - Except if:
 - The CE has taken action in reliance thereon.
 - The authorization is for insurance coverage





Privacy Specialist Functionality Revoking an Authorization (2 of 3)

Select the Authorization ID hyperlink







Privacy Specialist Functionality Revoking an Authorization (3 of 3)

- 2. Scroll to the bottom of the screen to the Revoked Status box
- Place a check in the Revoked check box
- 4. Select the date and the revoking person's identity in the drop-down box
- 5. Click on the Update button





Defer

Privacy Specialist Functionality Recording a Complaint (1 of 9)

- Individuals have the right to make a complaint concerning DHA's implementation and compliance with the HIPAA Privacy Rule
- You must provide that process and make it available
- You must document all complaints and their disposition
- You must not intimidate, threaten, coerce, discriminate against, or take other retaliatory action against any individual for exercising their rights or obligations





Privacy Specialist Functionality Recording a Complaint (2 of 9)

- Privacy/Security Officers are able to track complaints using the PHIMT
- The PHIMT allows for easy tracking and documentation of complaints in one centrally managed application
- Privacy/Security Officers can quickly create complaint reports





Privacy Specialist Functionality Recording a Complaint (3 of 9)

Select the Requests Tab
 The Create New Request Screen will appear

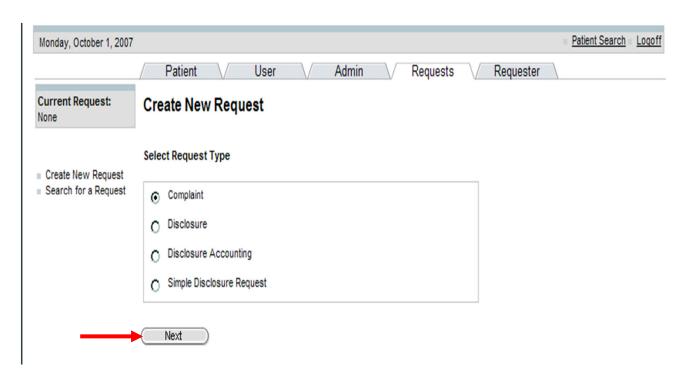






Privacy Specialist Functionality Recording a Complaint (4 of 9)

- 2. Click the Complaint radio button
- 3. Click on the Next button

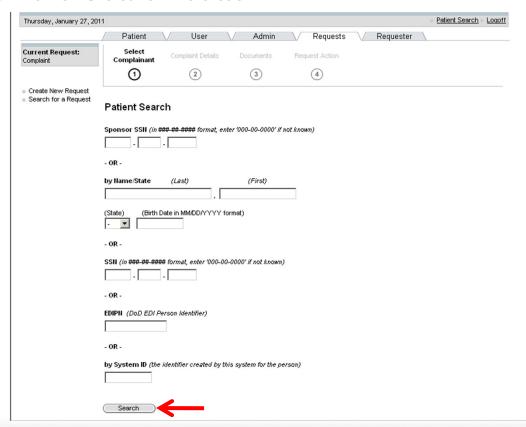






Privacy Specialist Functionality Recording a Complaint (5 of 9)

- 4. Enter Patient Search criteria
- 5. Click on the Search button







Privacy Specialist Functionality Recording a Complaint (6 of 9)

6. Select the Patient

The Complainant Details Screen will appear

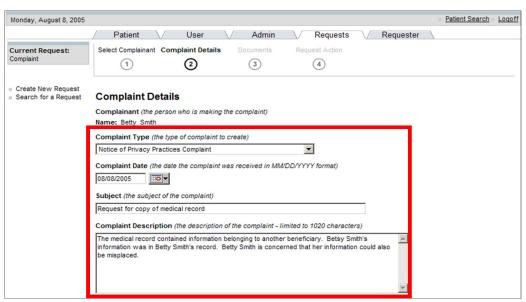




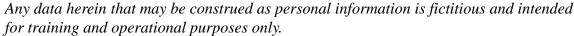


Privacy Specialist Functionality Recording a Complaint (7 of 9)

- Complete the Complaint Details: complaint type, complaint date, subject and description of the complaint
- 8. Scroll to the bottom of the screen and click on the Next button



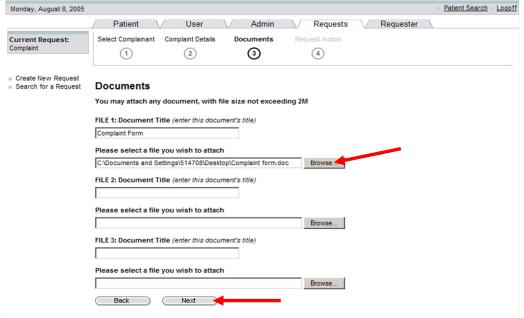






Privacy Specialist Functionality Recording a Complaint (8 of 9)

- 9. To attach any documents, type in the document title
- 10. Click on the Browse button to attach the file
- 11. Click on the Next button

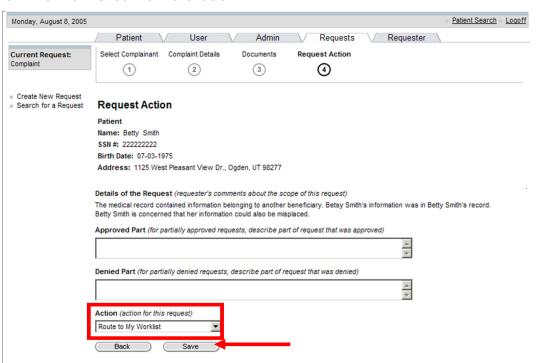






Privacy Specialist Functionality Recording a Complaint (9 of 9)

- 12. Select the appropriate action from the drop-down box
- 13. Click on the Save button







Privacy Specialist Functionality **Summary**

- You should now be able to:
 - Perform the Patient Search
 - Approve/Deny a Request for Disclosure/Accounting of Disclosures
 - Record a Disclosure/Accounting of disclosures
 - Amend a disclosure
 - Create a suspension
 - Record a restriction
 - Generate correspondence
 - Create/sign/revoke an authorization



Record a complaint



Administrative Summary Reports





Administrative Summary Reports Objectives

- Upon completion of this training you should be able to:
 - Run Administrative Summary Reports
 - View Administrative Summary Reports
 - Interpret the report data





Administrative Summary Reports Report Capabilities

- The PHIMT is capable of running several reports, which are called Administrative Summaries
- Administrative Summaries provide a visual representation or snapshot view of your facilities disclosure activities
- Performed by Privacy Specialists





Administrative Summary Reports Administrative Summary Reports (1 of 2)

- Select the Admin Tab
- 2. Select the Administrative Summary hyperlink

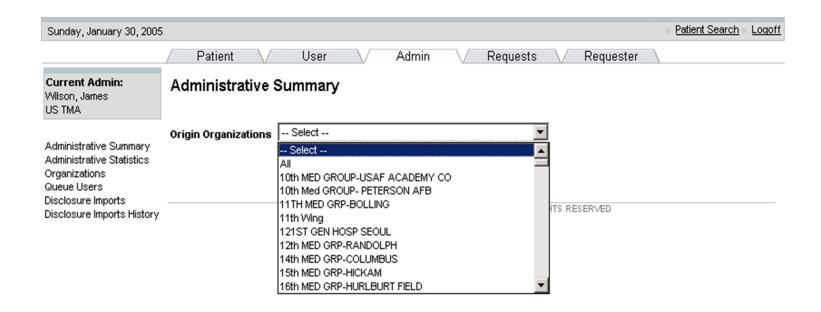






Administrative Summary Reports Administrative Summary Reports (2 of 2)

3. Select your Organization from the drop-down box



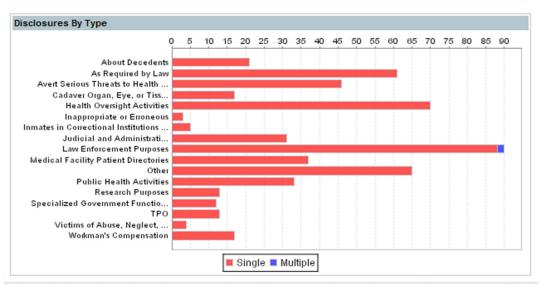




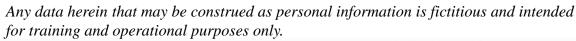
Administrative Summary Reports Report Results

Request Metrics			
Total Disclosure Requests	244	Total Pending Disclosure Requests	90
Total Complaint Requests	156	Total Pending Complaint Requests	40
Total Accounting Requests	193	Total Pending Accounting Requests	128
Total PHI Access with Disclosure Requests	0	Total Pending PHI Access with Disclosure Requests	0
Total PHI Access Requests	0	Total Pending PHI Access Requests	0

Disclosure Metrics (Including Disclosure Requests)				
Total Disclosures	538	Total Pending Disclosures	164	
Total Multiple Disclosures	2			
Total Single Disclosures	536			









Administrative Summary Reports **Summary**

- You should now be able to:
 - Run Administrative Summary Reports
 - View Administrative Summary Reports
 - Interpret the report data





PHIMT Help Desk

- Responsible for:
 - Creating user accounts
 - Updating user accounts
 - Assisting users with questions and/or issues
- Contact Information
 - mhssc@timpo.osd.mil
 - CONUS: (800) 600-9332
 - OCONUS: visit the MHS Help Desk web site (https://mhssc.timpo.osd.mil) for a list of access numbers





PHIMT

Presentation Summary

- You should now be able to:
 - Identify the use of the PHIMT in meeting the Accounting of Disclosures requirement of the HIPAA Privacy Rule
 - Describe the necessary policies and procedures
 - Describe and perform all Privacy Specialist functionality
 - Describe and interpret the data that the PHIMT can provide for compliance measurement
 - Implement PHIMT at your facility



