Protected Health Information Management Tool (PHIMT)

Regular User
Version 3.0
April 2011

Any data herein that may be construed as personal information is fictitious and intended for training and operational purposes only.
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 Regular User functionality
Introduction to PHIMT
Introduction to PHIMT

Objectives

Upon completion of this lesson 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?

- 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
  - 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

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<table>
<thead>
<tr>
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<th></th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>As required by law</td>
</tr>
<tr>
<td>2</td>
<td>Avert serious threats to health or safety</td>
</tr>
<tr>
<td>3</td>
<td>Specialized government functions</td>
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<tr>
<td>4</td>
<td>Judicial and administrative proceedings</td>
</tr>
<tr>
<td>5</td>
<td>Medical facility patient directories</td>
</tr>
<tr>
<td>6</td>
<td>Cadaver organ, eye or tissue donation purposes</td>
</tr>
<tr>
<td>7</td>
<td>Victims of abuse, neglect or domestic violence</td>
</tr>
</tbody>
</table>
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
Introduction to PHIMT

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 DHA
- **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

- **User Admin** 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.

- **Privacy Specialist** 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.
These do not exist at this point, but can be added to the 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
Regular User Functionality
Regular User Functionality

Objectives

• Upon completion of this lesson you should be able to:
  – Search for a patient
  – Record a Request for Disclosure/Accounting of Disclosures
  – Identify the streamlined process for recording a disclosure
Regular User 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
Regular User Functionality

Patient Search (1 of 4)

- The user must search for a patient record in order to:
  - Track a disclosure
  - Identify an authorization or restriction
  - Track a complaint
Regular User Functionality

Patient Search (2 of 4)

1. Select the Patient Tab
2. Type in the Search Criteria
3. Click on the Search button
Regular User Functionality
Patient Search (3 of 4)

**NOTE:** 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.
Regular User Functionality
Patient Search (4 of 4)

• The Search Results screen will display

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Regular User Functionality

Recording a Request (1 of 11)

- An individual has a right to receive an accounting of disclosures of PHI made by a CE in the 6 years prior to the date that the accounting is requested
  - DoD 6025.18-R Chapter 13

- Regular Users can record a request for:
  - A disclosure
  - An accounting of disclosures

- Only Privacy Specialists can approve or deny the request
Regular User Functionality

Recording a Request (2 of 11)

1. Select the Requests Tab
2. Click on the Disclosure radio button
3. Click on the Next button

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Regular User Functionality
Recording a Request (3 of 11)

4. Type in the patient search criteria
5. Click on the Search button

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6. Select the patient by clicking on their name

<table>
<thead>
<tr>
<th>Name</th>
<th>ID</th>
<th>SSN</th>
<th>Sponsor SSN</th>
<th>Birth Date</th>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Smith, Joe</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Smith, Joe</td>
<td></td>
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</tr>
</tbody>
</table>

Other options:
- Adjust your search criteria and try again.
- Create a new Patient record.

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Regular User Functionality

Recording a Request (5 of 11)

7. Select the Requester (The Requester Search screen will appear)
8. Complete the information fields to search by patient, third party organization, person, or organization (Only complete one field)
9. Click, Select, or Search (for that field)
   – Example: If the request is being made by the patient themselves, click on the Select button next to the patient’s name
Regular User Functionality
Recording a Request (6 of 11)

10. Confirm Requester and Recipient Details. Verify and/or complete the information fields
11. Click on the Next button

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Regular User Functionality
Recording a Request (7 of 11)

12. Enter/Confirm the Request Details
13. Click Next

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Regular User Functionality

Recording a Request (8 of 11)

14. Enter in the Disclosure Details: Request date, disclosure type, origin organization and disclosure purpose

NOTE: The Disclosure description will be automatically populated once a disclosure type is selected.

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Regular User Functionality
Recording a Request (9 of 11)

15. Scroll down the screen and enter: PHI description and disclosure comments
16. Click on the Next button
Regular User Functionality
Recording a Request (10 of 11)

17. Enter in the Request Action Details
18. From the Action drop-down box, select the appropriate routing option (Privacy Specialist)
19. Click on the Save button

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Regular User Functionality
Recording a Request (11 of 11)

The Disclosure Request Summary will display

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Regular User Functionality

Recording a Request- Streamlined Process

- The Streamlined Disclosure process was requested by the field to:
  - Decrease the number of steps for recording a disclosure request
  - Eliminate optional fields that were not required
- Users can still record a disclosure request using the Wizard
- Disclosure descriptions were added to the PHIMT to make it easier for the user to select the appropriate Disclosure Type
Regular User Functionality

Simple Disclosure vs. Disclosure Wizard

- The Simple Disclosure radio button includes two screens:
  - Select Patient
  - Disclosure Details

- The Disclosure radio button (Wizard) includes 5 screens:
  - Select Patient
  - Select Requester
  - Request Details
  - Disclosure Details
  - Request Action
Regular User Functionality

Simple Disclosure Request (1 of 9)

1. Click on the Requests Tab
2. Click on the Simple Disclosure radio button
3. Click the Next button
Regular User Functionality

Simple Disclosure Request (2 of 9)

4. Type in the patient search criteria
5. Click on the Search button
6. Select patient from the Search Results screen

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Regular User Functionality

Simple Disclosure Request (4 of 9)

7. Click on the Multiple Disclosures for the same purpose radio button (The disclosure frequency was added to differentiate between single and multiple disclosures. It is defaulted to single)

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Regular User Functionality
Simple Disclosure Request (5 of 9)

8. The Disclosure Frequency fields will appear
9. Select the occurrence, start date, and end date
10. Click on the Requester Change button

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Regular User Functionality
Simple Disclosure Request (6 of 9)

11. Search for the Requester

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12. Select the Requester from the Search Results screen

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Regular User Functionality
Simple Disclosure Request (8 of 9)

13. Select the Requester Identity Verified drop-down
14. Select the Disclosure Type from the drop-down

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Regular User Functionality
Simple Disclosure Request (9 of 9)

15. Select the Disclosure Purpose from the drop-down
16. Complete the “Other/Details” text box
17. Scroll down the screen and enter: PHI description and disclosure comments

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Regular User Functionality

Summary

- You should now be able to:
  - Search for a patient
  - Record a Request for Disclosure/Accounting of Disclosures
  - Identify the streamlined process for recording a disclosure
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 Regular User functionality