



Right to an Accounting of Disclosures of PHI Policy

April 2026

SCOPE:

This policy applies to all workforce members, including employees, contractors, and business associates who access, use, or disclose PHI.

POLICY STATEMENT:

In accordance with the **Health Insurance Portability and Accountability Act (HIPAA)**, patients have the right to request an accounting of certain disclosures of their Protected Health Information (PHI) made by Florida Atlantic University.

REASON FOR POLICY:

To ensure individuals can obtain a record of disclosures of their PHI that were made without their authorization, as required by the HIPAA Privacy Rule.

PROCEDURES:

1. Patient Right

Patients may request a written accounting of disclosures of their PHI for up to six (6) years prior to the date of the request.

2. Disclosures Included

The accounting will include disclosures made for purposes such as:

- Public health reporting
- Health oversight activities
- Judicial or administrative proceedings
- Law enforcement purposes
- Other disclosures required by law

3. Disclosures Not Included

The accounting will not include disclosures made for:

- Treatment, payment, or healthcare operations
- Disclosures made directly to the patient

- Disclosures authorized by the patient
- Incidental disclosures permitted by HIPAA
- Other disclosures permitted by HIPAA

4. Request Process

Patients must submit a written request to the Privacy Officer or designated department responsible for HIPAA compliance.

5. Response Time

Florida Atlantic University will provide the accounting within **60 days** of receiving the request. If additional time is required, a one-time extension of up to **30 days** may be provided with written notice to the patient.

6. Fees

The first accounting within a 12-month period will be provided at no cost. A reasonable cost-based fee may be charged for additional requests during the same period.

7. Responsibility

The Privacy Officer is responsible for ensuring compliance with this policy and maintaining documentation of disclosures as required.