

USE AND DISCLOSURE OF PROTECTED HEALTH INFORMATION FOR FUNDRAISING PROCEDURE

1. A member of the BBHMF workforce who desires to use protected health information for fundraising purposes must first apply, in writing, to receive authorization from the Privacy Official. The application must demonstrate that the communication will comply with all applicable requirements of the above policy.
2. If the Privacy Official is satisfied that fundraising activity will comply with this policy, he or she shall authorize the use of PHI for the activity, in writing, specifying which PHI pertaining to which types or categories of patients may be used. (For example: "name and address of all patients on record," or "name and address of all patients treated within the past six months and the department in which they received services including the outcome.")
3. If the Privacy Official is not satisfied that the activity will comply with this policy, he or she will respond, in writing, explaining why the activity cannot be approved.
4. The Privacy Official will retain copies of all fundraising communications and correspondence, in connection with the use of PHI for fundraising activities, for at least six years or longer if required by state law or regulation.
5. The Privacy Official will assist Information Systems to develop and maintain a master list of patients to whom fundraising communications may be sent, and procedures to remove the PHI of anyone who opts out of receiving future fundraising communications.

REFERENCE: 45 CFR § 164.514(f)

Effective Date: 4/14/03

Dates Revised: 9/23/13