

ALTERNATIVE COMMUNICATION OF HEALTH INFORMATION POLICY

RESPONSIBILITY: Privacy Official or Designee(s)

BACKGROUND:

To protect their confidentiality, some patients may want to have communications that contain their protected health information (PHI) sent to them by alternative means, or to an alternative address. Behavioral Health and Health Facilities (BHHF) will accommodate such requests as long as they are reasonable.

In this context, “alternative” means different from the usual. For instance, a patient may request that bills be sent to a post office box rather than to the address listed in BHHF’s billing records. Or a patient may request that appointment reminders be sent in a sealed envelope rather than by postcard.

POLICY:

Patients may request that any communication of protected health information from BHHF be sent to them by alternative means or to an alternative address. The request may apply to all communications, or only to communication of certain specific information.

BHHF will comply with any such request that is “reasonable,” provided that:

1. If the request involves a change in billing procedures, the patient provides information on how payment will be handled. For instance, if a bill is sent directly to the patient rather than to the named insured on the patient’s insurance policy, will the patient pay the bill?
2. The patient is specific in providing an alternative address and/or the alternative means of communication to be used.
3. The incremental cost of complying with the request for alternative communication is reasonable, or the patient makes arrangements to pay the incremental cost.

In determining whether a request is reasonable, members of the workforce MAY NOT require the patient to state the reason for requesting alternative communications. The reasonableness of the request must be determined only on the basis of the administrative difficulty to comply with it.

Effective Date: 4/14/03

Dates Revised:

A handwritten signature in black ink, appearing to read "Jerome Lovrien", is positioned above a horizontal line.

Jerome E. Lovrien, Commissioner, Bureau for Behavioral Health and Health Facilities