

Issuing Department: Internal Audit, Compliance, and
Enterprise Risk Management

Effective/Reissue Date: 10/5/2016
Current Version: 4/1/2024

The Accounting of Disclosures Database is accessible:

- at <https://central.nyumc.org/xm/Private/AccountingOfDisclosures/SitePages/default.aspx>
- through the Inside Health Applications Catalog page.

Disclosures should only be made in accordance with the NYU Langone Health's established policies and procedures.

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1. When PHI is Disclosed for an included purpose, the Disclosure must be recorded in the patient's medical record or in the Accounting of Disclosures Database, as each record is shared.
 - Include in the electronic medical record (i.e., Epic) using the quick disclosure tool when possible.
 - Include in the Accounting of Disclosures Database when: the Disclosure involves multiple records, the Workforce Member does not have access to the medical record, or the Disclosure cannot otherwise be tracked in the medical record.
 2. Workforce Members must record the following information for each Disclosure:
 - who the Disclosure was made by (e.g., NYU Langone Hospitals, NYUSOM, including the specific practice)

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- a brief description of the Research protocol or other Research activity, including the purpose of the Research and the criteria for selecting particular records,
- a brief description of the type of PHI that was Disclosed,
- the date or period of time during which Disclosures occurred, and
- the name, address, and telephone number of the entity that sponsored the Research and of the researcher to whom the information was Disclosed.

De-Identification of PHI and Limited Data Sets
HIPAA Privacy Policies, Procedures, and Documentation
HIPAA Privacy Policies and Procedures Definitions
Right to Request an Accounting of Disclosures
Uses and Disclosures of PHI Required or Permitted by Law
Use and Disclosure of PHI for Research

45 C.F.R. §164.528

This version supersedes all NYU Langone Health (as defined in this Policy) previous policies, including but not limited to NYU Hospitals Center, New York University School of Medicine, Lutheran Medical Center, and Winthrop University Hospital.