

Requests by Patients for Alternative Confidential Communications

RATIONALE

The Health Insurance Portability and Accountability Act (HIPAA) requires that patients be allowed to request communication from a healthcare provider by an alternative means or at an alternative location (e.g., other than their home address or telephone number). Palmer College of Chiropractic (College) complies with the Privacy Rule with respect to patients request for alternatives to communication.

PURPOSE

The Requests by Patients for Alternative Confidential Communications policy (Policy) establishes and describes the College's expectations regarding patients' requests regarding how their protected health information (PHI) may be communicated to them by an alternative means or at an alternative location.

SCOPE

This Policy applies to the entire College community, which is defined as including the Davenport campus (Palmer College Foundation, d/b/a Palmer College of Chiropractic), West campus (Palmer College of Chiropractic West) and Florida campus (Palmer College Foundation, Inc., d/b/a Palmer College of Chiropractic Florida) and any other person(s), groups, or organizations affiliated with any Palmer campus.

DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings specified below:

- > The term **“alternative communication”** refers to communication from provider to patient by an alternative means or at an alternative location. Examples may include using an alternate mailing address or phone number; or using an alternate communication vehicle (phone, mail or email) rather than the provider's standard method of communication.
- > The term **“College”** refers to Palmer College of Chiropractic, including operations on the Davenport campus; West campus; and Florida campus.

- > The term “**College community**” refers to all students, faculty, staff (including administration), and any other person(s), groups, or organizations affiliated with any Palmer campus.
- > The term “**Palmer College of Chiropractic Health Care Component**” (PCC HCC) refers to those health care units of Palmer College Foundation and Palmer College of Chiropractic West that have been designated as part of its health care component. For more information, refer to the Institutional Policy, Designation of the Palmer College of Chiropractic Health Care Component.
- > The term “**protected health information**” (PHI) refers to information, including demographic information, which relates to the individual’s past, present or future physical or mental health or condition; the provision of health care to the individual; or the past, present or future payment for the provision of health care to the individual, and that identifies the individual or for which there is a reasonable basis to believe can be used to identify the individual. PHI includes many common identifiers (e.g. name, address, birthdate, Social Security number) when such can be associated with the health information listed above. PHI does not include student records held by educational institutions or employment records held by employers. However, this information is still treated confidentially under other applicable laws.

ADMINISTRATIVE RULES

Patients may request they receive communications that contain PHI by alternative means or at alternative locations at the time of visit, or at any time during the course of their care.

Patient requests to receive communications that contain PHI by alternative means or at alternative locations must be made in writing using the [Alternative Confidential Communication Request Form](#).

Each PCC HCC unit (hereafter referred to as “department”) has designated a HIPAA Privacy Officer (the Privacy Officer functions as the Privacy Coordinator for those departments comprised of individuals performing internal business support functions on behalf of the departments that provide health care). The HIPAA Privacy Officer will make decisions about reasonableness of the request.

All patient requests should be forwarded to the HIPAA Privacy Officer at the PCC HCC department for a decision.

Denial of Requests

The PCC HCC department may deny a request for alternative confidential communications only if:

1. The request is unreasonable from an administrative standpoint and/or;
2. The patient does not provide an alternative address or other method of contact.

Reasonableness of a request from an administrative standpoint may vary by the size and complexity of the PCC HCC department.

The PCC HCC department will not require that the patient provide a reason for their request.

The PCC HCC department will not deny requests based on its perception of whether the patient has a good reason for making the request. A patient's reason for making a request cannot be used to determine whether the request is reasonable.

Granted Requests

If a PCC HCC department grants a patient's request, it will inform appropriate PCC HCC personnel in the department of the alternative communication requirements and will require adherence to the granted request.

An alternative communication request that is implemented remains in place until it is revoked by the patient or until such time as the PCC HCC department determines that it no longer meets the administrative reasonableness criteria. Revocation or denial of an implemented request will be communicated to provider and patient and documented in the patient record.

Each patient will be informed in writing whether the request has been granted or denied and, if granted, that all future communications initiated by the PCC HCC department will be made in this manner.

EXCEPTION

If it is necessary to communicate urgently with the patient, PCC HCC personnel may use any available address or phone number.

Each PCC HCC department must develop processes to implement the granted change requests within each department.

DOCUMENTATION REQUIREMENTS

If the PCC HCC department grants a patient's request, the decision will be documented by maintaining a written or electronic record of the action taken.

Patient written requests for alternative communication and the PCC HCC department's response will be maintained in the medical record.

STANDARD INSTITUTIONAL POLICY PROVISIONS

Institutional policies are supplemented by provisions that are applicable to all institutional policies. It is the responsibility of all employees and students to know and comply with these standards.

- > [Standard Provisions Applicable to All Institutional Policies](#)

Additional Information

ASSOCIATED POLICIES, PROCESSES AND/OR PROCEDURES

This Policy is supplemented below. It is the responsibility of all employees and students to know and comply with policies and procedures as supplemented.

POLICIES

- > [Designation of the Palmer College of Chiropractic Health Care Component](#)

PROCESSES AND/OR PROCEDURES

- > [N/A](#)

FORMS/INSTRUCTIONS

- > [Alternative Confidential Communication Request Form](#)
- > [Sample Letter Accepting Individual's Request for Alternative Confidential Communications](#)
- > [Sample Letter Denying Individual's Request for Alternative Confidential Communications](#)

OTHER RELATED INFORMATION

- > 45 CFR 164.522(b) (HIPAA Privacy Rule)
- > 45 CFR 164.510 (HIPAA Privacy Rule)

> 45 CFR 164.502(h) (HIPAA Privacy Rule)

CONTACTS

Privacy Officers

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HISTORY

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