

# Disclosing PHI with Health Care Providers for Treatment Purposes

## Policy

{{OrgName}} is committed to ensuring that when another treating provider of a patient requests information about that patient for treatment purposes, {{OrgName}} discloses the requested protected health information (PHI), when permitted under HIPAA and other applicable law and in a manner that does not constitute information blocking under the 21<sup>st</sup> Century Cures Act.

{{OrgName}}'s policy on disclosing PHI for treatment purposes permits disclosing PHI with other treating providers without needing a patient's authorization. The minimum necessary standard does not apply to disclosures of PHI made in response to other providers for treatment purposes.

Information blocking is a practice that is likely to interfere with access, exchange, or use of electronic health information (EHI). See also {{OrgName}}'s policy on Information Blocking; Exceptions.

## Procedure

If a {{OrgName}} or a provider employed by {{OrgName}} receives a request from a health care provider requesting disclosure of PHI for treatment purposes, {{OrgName}} will make a reasonable effort to determine that the requesting provider is a treatment provider and will provide the PHI in the format requested if {{OrgName}} has the capability to do so. If {{OrgName}} does not have the technical capability to provide the PHI in the requested format, {{OrgName}} will contact the requesting provider to agree upon an alternate format.

Once the requesting provider has been identified as a treating provider and an acceptable and timely transmission format has been identified for disclosing the requested information, {{OrgName}} shall transmit the requested PHI to the requesting provider as expeditiously as possible but in no event later than 30 days from the original request. Note: unreasonable delay in transmission of requested electronic PHI may constitute information blocking, if {{OrgName}} delays transmission of the requested information in a manner that {{OrgName}} knows is unreasonable and/or is likely to or does interfere with access, exchange or use of electronic PHI by the requesting provider or the patient.

{{OrgName}} shall document name of the provider, the date of the receipt of the request for PHI and the requested PHI in the patient's medical record, along with the format of transmission, date and time of the transmission of the requested records to the requesting provider.