

UC Riverside, School of Medicine Policies and Procedures
Policy Title: Patient Requests for Alternative Means of Confidential Communications
Policy Number: 950-02-038

Responsible Officer:	Chief Compliance & Privacy Officer
Responsible Office:	Compliance Advisory Services
Origination Date:	06/2013 (COM 9.0)
Date of Revision:	05/10/2024
Scope:	UC Riverside School of Medicine

I. Policy Summary

Under the Privacy Rule of The Health Insurance Portability and Accountability Act of 1996 (HIPAA), a UCR Health patient has the right to request that UCR Health communicate with them about their protected health information through certain formats or at particular locations. This policy describes how a patient may exercise this right and UCR Health’s obligation to accommodate reasonable requests.

II. Definitions

"Confidential Communications Request" is defined as a patient's right to request in writing an alternate means to communicate protected health information (PHI) in written, electronic or oral formats.

"Protected health information" or "PHI" is any individually identifiable health information regarding a patient's medical or physical condition or treatment in any form created or collected as a consequence of the provision of health care, in any format including verbal communication.

"Notice of Privacy Practice (NPP)" is the document that explains to patients their privacy rights as required by HIPAA and provides the patients with Notice as to how the University of California Health uses and discloses patient information.

For other definitions in this policy, refer to the HIPAA privacy and security implementing regulations at 45 CFR Parts 160, 162, and 164.

III. Policy Text

- A. UCR Health typically communicates with patients about their health care via MyChart messages, mailings to the patient’s home address, or by phone at the patient’s primary number.
- B. As a HIPAA Covered Entity, UCR Health must permit individuals to request alternative means of communication with them regarding their PHI or to communicate with them at alternative locations. For example, the patient may request contact via an alternative phone number, such as a cell phone, alternative address, or through electronic communications such as e-mail or fax. UCR Health will accommodate reasonable requests.
- C. UCR Health cannot require the individual to explain the reason for the request.
- D. Patients may request changes to how UCR Health communicates with them via the settings in the patient’s MyChart account. This is the preferred method of requesting changes.
- E. Patients also may submit request alternative means of communication in writing to University of California Riverside Health Correspondence, Health Information Management Department, 900 University Avenue, Mail Code 423, Riverside, California 92521. The written request must include specific instructions as to location, address, phone, or fax number and must include the date and patient's signature.

- F. When the requests are for mailed communications, other than standard first class mail, the patient must provide payment in advance for all costs of mailing to one or more alternative locations (e.g., FedEx, express mail, etc.).
- G. The responsible individual who has received a written request for alternative means of communication should maintain a record of all requests, and maintain a copy of the response.
- H. UCR Health, regardless of a patient's right to request confidential forms of communication of PHI, should follow UCR Health policies and procedures to protect the confidentiality of PHI and ePHI.

IV. Procedures

A. UCR Health Information Desks, Ambulatory Site Operators, All Ambulatory Staff Registration Personnel and Health Information Management Personnel.

1. Upon initial appointment to UCR Health Ambulatory Practice Sites, Front Office/ Registration personnel will provide the HIPAA Notice of Privacy Practices (HIPAA NPP) to the patient, obtain an acknowledgement form and file the acknowledgement in patient's medical record and/or record acknowledgement in the electronic health record.
2. The HIPAA NPP is available in all UCR Health Ambulatory Practice Sites for patient access and review. Once per year thereafter, the Ambulatory Front Office registration staff will be responsible for providing the HIPAA NPP to the patient and assure that the patient sign the Acknowledgement form.

B. Patient/Personal Representative

1. Within the HIPAA NPP, the patient/personal representatives have the right to request that UCR Health communicate about medical matters in a certain way or at a certain location.
2. The patient must request changes to the standard method of communications either through updates to the settings in the MyChart account or submitting a request in writing to University of California Riverside Health Correspondence, Health Information Management Department.

C. Ambulatory Practice Site Front Office/registration Staff

1. Receives written "Request for Confidential Communications" and validates the authenticity and authority of the requestor.
2. Records the date that the Request is received and places a copy in the patient's medical record for future reference and forwards a copy to the Health Information Management Department for future reference.
3. The information in the Request for Confidential Communications will be updated as reasonably requested by the patient.

V. Related Information

CFR 164.522

Notice of Privacy Practice Procedure

Approvals:

COMPLIANCE COMMITTEE (09/03/2024)

Signed by:

Paul Hackman

9/20/2024 | 10:59 PM PDT

BC5CF44DC0494EA...

PAUL HACKMAN, J.D., L.L.M.
CHIEF COMPLIANCE AND PRIVACY OFFICER,
SCHOOL OF MEDICINE

DATE

Signed by:

Deborah Deas

9/21/2024 | 4:45 PM PDT

870C12B416E84CB...

DEBORAH DEAS, M.D., M.P.H
VICE CHANCELLOR, HEALTH SCIENCES
DEAN, SCHOOL OF MEDICINE

DATE