

	Ethics & Compliance Department	
	Policy No.: 36	Created: 01/2018
		Reviewed: 09/2024
	Revised:	

HIPAA: GENERAL REQUIREMENTS FOR DISCLOSURE OR RELEASE OF INFORMATION

SCOPE:

All Envision Healthcare teammates. For purposes of this policy, all references to “teammate” or “teammates” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

Envision Healthcare Operating, Inc. and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this General Requirements for Disclosure or Release of Information policy to define the process requirements for disclosing PHI.

POLICY:

The process of disclosure will vary based on the content of the information and the circumstances surrounding the disclosure.

- A) In general, the Company will disclose a patient’s PHI to any person, entity, or company only:
 - (1) After verification that the disclosure is authorized by the treatment, payment, or operations definitions of the Privacy Regulations;
 - (2) The disclosure is to a bona fide Business Associate;
 - (3) The disclosure is to the patient him/herself; or
 - (4) A valid authorization has been received.

- B) The department may use or disclose PHI without prior written consent under the following circumstances:
 - (1) If the Company has an indirect treatment relationship with the patient;
 - (2) In emergency treatment situations;
 - (3) If required by law; or

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(4) If the patient’s consent to receive treatment is clearly inferred from the circumstances.

C) The Company will not disclose an entire medical record except when the entire medical record is specifically justified as the amount that is reasonably necessary to accomplish the purpose of the use, disclosure, or request.

D) The Company will release information that was received or created outside the process of providing treatment, payment, or health care operations, only with direct authorization from the patient. When releasing information based on a patient authorization, the department will only disclose information consistent with terms of the authorization.

POLICY REVIEW

The Ethics & Compliance Department will review and update this Policy, when necessary, in the normal course of its review of the Company’s Ethics & Compliance Program.