

**UNIVERSITY OF FLORIDA**  
**INFORMATION PRIVACY POLICIES & PROCEDURES**  
**HEALTH INFORMATION OPERATIONAL GUIDELINES**

**I. Uses and Disclosures: Treatment, Payment and Operations**

**A. POLICY**

Rev. 06/01/2005

**Use and Disclosure:** The University of Florida will use and disclose protected health information for treatment, payment, and health care operations in accordance with applicable federal and state regulations and laws.

**B. DEFINITIONS**

1. **Disclose:** To release, transfer, provide access to, or divulge in any manner, protected health information held by the University of Florida.
2. **Use:** To employ, apply, utilize, share, examine, or analyze within the University of Florida, protected health information held by the University.
3. **Treatment:** The provision, coordination, or management of health care and related services by one or more health care providers, including the coordination or management of health care by a health care provider with a third party; consultation between health care providers relating to a patient; or the referral of a patient for health care from one provider to another.
4. **Payment:** Activities undertaken by a health care provider or health plan to obtain or provide reimbursement for the provision of health care that relate to the patient to whom health care is provided. (See the Glossary for full definition.)
5. **Health Care Operations:** Any of the following activities of the covered entity:
  - a) *Conducting Quality Assessment and Improvement activities*
  - b) *Reviewing the competence or qualifications of health care professionals, evaluating practitioner and provider performance, conducting training programs, accreditation, certification, licensing, or credentialing activities;*
  - c) *Conducting or arranging for medical review, legal services, and auditing functions, including fraud and abuse detection and compliance programs;*
  - d) *Business planning and development, and*
  - e) *Business management and general administrative activities of the entity. (See the Glossary for full definition.)*

**C. PRIVACY REQUIREMENTS**

1. **Using and Disclosing PHI within the University of Florida:** The University may use and/or disclose protected health information for provision of treatment, payment, and health care operations, in accordance with relevant state and federal laws.
2. **Disclosing PHI to other covered entities outside the University of Florida:** The University may disclose protected health information:
  - a) *Upon request, to a health care provider who is providing treatment to the patient.*

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*b) Upon written authorization by the patient or the patient's legal representative for any other purpose.*

3. **Organized Health Care Arrangement (OHCA):** The University of Florida participates in an organized health care arrangement with other health care providers and covered entities and routinely discloses protected health information about patients to the other participants in the arrangement for treatment, payment, and health care operations.

**D. PROCEDURE:**

1. **Using and Requesting Patient Information:** Limit uses of and requests for protected health information to the minimum necessary to accomplish the purpose for which the information is needed. (See Minimum Necessary Rule)
2. **Disclosing Patient Information:** Limit disclosures of protected health information to the items specified by the recipient as necessary to accomplish the purpose for which the information is needed. (See Minimum Necessary Rule)

**E. REFERENCES:**

1. **HIPAA:** 45 CFR §164.506 (Uses and Disclosures for TPO)
2. **Florida Statutes:** 384 (Sexually Transmissible Diseases), 394 (Mental Health) and 397 (Substance Abuse)

**F. EXHIBITS: None**