

POLICY AND PROCEDURE

REACH for Tomorrow

Release of Information and Consent Documentation Procedure

Partial Hospitalization Program (PHP)

Effective Date: 08/15/2025

Approved By: Director of Medical and Clinical Services

Review Schedule: Annually or as Needed

Applies To: All Programs — Outpatient MH/SUD, IOP, PHP, and Integrated Primary Care/Behavioral Health

Purpose

To establish procedures for obtaining, documenting, and managing client authorization for the release of protected health information (PHI). These procedures ensure that disclosures of information support coordinated care while protecting confidentiality and complying with applicable laws and accreditation standards.

Policy

The Partial Hospitalization Program requires appropriate authorization prior to releasing protected health information to external providers, agencies, or individuals unless disclosure is permitted by law. All releases of information must be documented in the clinical record and comply with HIPAA, 42 CFR Part 2 when applicable, and organizational confidentiality policies.

Applicable Privacy Regulations

All information disclosures must comply with applicable laws including:

- Health Insurance Portability and Accountability Act (HIPAA)
- 42 CFR Part 2 when substance use disorder information is involved
- Applicable state confidentiality laws
- Organizational privacy and confidentiality policies

Authorization for Release of Information

Prior to releasing information, staff must obtain a signed authorization form from the individual served unless disclosure is permitted by law.

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The authorization form must include:

- Name of the individual served
- Name of the person or organization authorized to receive information
- Description of the information to be disclosed
- Purpose of the disclosure
- Expiration date or event
- Signature of the individual served (or legal representative)
- Date of authorization

Verification Prior to Disclosure

Before releasing information, staff must verify:

- That a valid authorization form exists
- That the authorization has not expired or been revoked
- That the disclosure is limited to the information authorized

Methods of Disclosure

Authorized disclosures may occur through secure methods including:

- Secure electronic transmission
- Fax to verified healthcare providers
- Written correspondence
- Secure electronic health record exchange when available

Revocation of Authorization

Individuals served have the right to revoke authorization for disclosure at any time unless action has already been taken based on the authorization. Revocation must be documented in the clinical record and honored moving forward.

Documentation Requirements

Documentation related to information disclosure must include:

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- Signed authorization forms
- Date and method of disclosure
- Recipient of the information
- Description of information released
- Staff responsible for the disclosure

Minimum Necessary Standard

When releasing information, staff must limit disclosure to the minimum necessary information required to fulfill the intended purpose of the request.

Staff Responsibilities

Staff are responsible for:

- Ensuring proper authorization prior to disclosure
- Protecting confidentiality of client information
- Following secure communication procedures
- Documenting all disclosures appropriately

Quality Monitoring

Release of information practices are periodically reviewed through chart audits and compliance monitoring to ensure adherence to confidentiality requirements and documentation standards.