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## PP-00 Glossary of Terms

**DEFINITIONS:**

The following table is a glossary of terms referred to in UW Medicine's Privacy Program.

Term	Definition
<b>Authorization</b>	A written document that gives covered entities permission to use and/or disclose specific protected health information (PHI), for purposes other than treatment, payment or healthcare operations (TPO), or to disclose PHI to a 3 <sup>rd</sup> party identified by the individual.
<b>Business Associate</b>	A person or entity, other than a member of the workforce, who performs certain functions, activities or services for or on behalf of UW Medicine, involving the use and/or disclosure of protected health information.
<b>Class of Person(s)</b>	Individuals within a group who have the same role and responsibilities (e.g., Nurse Practitioners, Physicians, Medical Students, Health Information Technician II).
<b>Common control</b>	<i>Common control</i> exists if an entity has the power, directly or indirectly, significantly to influence or direct the actions or policies of another entity.
<b>Common ownership</b>	<i>Common ownership</i> exists if an entity or entities possess an ownership or equity interest of 5 percent or more in another entity.
<b>Covered Entity</b>	A "Covered Entity" includes any of the following types of health care business organizations or individuals which transmit or maintain protected health information in electronic or other form or medium including: <ul style="list-style-type: none"> <li>◆ Health care provider (e.g., hospital or physician),</li> <li>◆ Health care plan (e.g., managed care program),</li> <li>Health care clearinghouse (e.g., third-party billing center)</li> </ul>
<b>Covered Functions</b>	Those functions of a covered entity the performance of which makes the entity a health plan, health care provider, or health care clearinghouse.
<b>Decedents</b>	Decedents is a term used chiefly in law to describe "a <a href="#">deceased</a> person".
<b>Designated Record Set</b>	A group of records maintained by or for UW Medicine that is: <ul style="list-style-type: none"> <li>◆ The medical records and billing records about an individual maintained by or for a covered health care provider;</li> <li>◆ Used, in whole or in part, by or for UW Medicine to make decisions about the individual.</li> </ul> <p><u>Note:</u> "Records" include any item, collection, or grouping of information that includes protected health information and is maintained, collected, used or disseminated by or for UW Medicine.</p>
<b>Disclosure</b>	Release, transfer, provision of access to, or divulging in any other manner of information outside the entity holding the information.
<b>Fundraising</b>	Please see UW Medicine Privacy Policy: <i>PP-10 Use &amp; Disclosure of Protected Health Information (PHI) For Fundraising.</i>

Term	Definition
<b>Health Care Component</b>	A “Health Care Component” is any component that would meet the definition of covered entity if it were a separate legal entity. A Health Care Component may also include a component that performs covered functions and components that perform activities that would make such component a business associate of a component that performs covered functions if the two components were separate legal entities.
<b>Health Care Operations</b>	<p>UW Medicine healthcare operations are those business functions required for managing and delivering health and medical services. These include all business processes relating to the following:</p> <p><u>Business Focused Activities</u></p> <ul style="list-style-type: none"> <li>◆ Business management and general administrative functions (e.g., HIPAA compliance),</li> <li>◆ Business planning and development (e.g., cost management analyses, planning-related analyses, formulary development, payment methods and coverage policies),</li> <li>◆ Disclosure of protected health information for legal and regulatory purposes,</li> <li>◆ Internal grievance resolution,</li> <li>◆ Customer service, provided health information is not disclosed,</li> <li>◆ Accreditation, certification, licensing or credentialing activities,</li> <li>◆ Health insurance contracting (e.g., underwriting, premium rating, reinsurance of risk relating to claims),</li> <li>◆ Medical review, legal services and auditing functions (e.g., fraud and abuse detection and compliance programs).</li> </ul> <p><u>Clinically-Focused Activities</u></p> <ul style="list-style-type: none"> <li>◆ Quality assessment including outcomes evaluation,</li> <li>◆ Clinical guidelines and clinical protocol development,</li> <li>◆ Case management and care coordination,</li> <li>◆ Patient contact regarding treatment alternatives,</li> <li>◆ Performance evaluation for healthcare professionals, providers, and practitioners,</li> <li>◆ Training programs for students, practitioners and non-healthcare professionals.</li> </ul>
<b>Health Information Management Service Area</b>	<p>Entity specific Health Information Management Service Areas handle several of the individual rights under HIPAA.</p> <p>Entity specific areas:</p> <p>HPCC – Health Data Services  HMC - Patient Data Services  UWMC - Patient Data Services  UWP – Privacy Coordinator  UW Physician’s Eastside Specialty Center - Operations  UWPN - Operations  UW Physician’s Sports Medicine Clinic – Sports Medicine</p>

Term	Definition
<b>Health Oversight Agency</b>	Health Oversight Agency is a public agency, Indian Tribe, or entity acting pursuant to a public agency's authority, that is authorized by law to oversee the health care system or government programs in which health information is necessary to determine eligibility or compliance, or to enforce civil rights laws for which health information is relevant. The definition of health oversight agency does not include private-sector accrediting organizations. Examples of health oversight activities include, but are not limited to, oversight of health care plans, health care providers, health care delivery systems, medical devices and pharmaceuticals.
<b>Housestaff</b>	Housestaff represents all levels of Residents and Fellows working at UW Medicine.
<b>Hybrid Entity</b>	A single legal entity that is a covered entity and whose covered functions are not its primary functions. The University of Washington (UW) has both health care components and Non-health care components. The health care components and components engaged in supporting the health care mission are subject to the HIPAA regulations.
<b>Indirect Treatment Relationship</b>	<p>A relationship between an individual and a UW Medicine health care provider in which:</p> <ul style="list-style-type: none"> <li>◆ The health care provider delivers health care to the individual based on the orders of another health care provider;</li> </ul> <p><b><u>AND</u></b></p> <p>The health care provider typically provides services or products, or reports the health care diagnosis or results directly to another provider, who, in turn, provides the services, products or reports to the individual.</p>
<b>Individual</b>	Person who is the subject of protected health information.
<b>Individually Identifiable Health Information</b>	<p>Individually identifiable health information is information that is a subset of health information, including demographic information collected from an individual, and:</p> <ul style="list-style-type: none"> <li>(1) Is created or received by a health care provider, health plan, employer, or health care clearinghouse; and</li> <li>(2) Relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual; and <ul style="list-style-type: none"> <li>(i) That identifies the individual; or</li> <li>(ii) With respect to which there is a reasonable basis to believe the information can be used to identify the individual.</li> </ul> </li> </ul>

Term	Definition
<b>Limited Data Set</b>	<p>A limited data set is protected health information that excludes the following direct identifiers of the individual or of relatives, employers, or household members of the individual:</p> <ol style="list-style-type: none"> <li>1. Names;</li> <li>2. Postal address information, other than town or city, State, and zip code;</li> <li>3. Telephone numbers;</li> <li>4. Fax numbers;</li> <li>5. Electronic mail addresses;</li> <li>6. Social security numbers;</li> <li>7. Medical record numbers;</li> <li>8. Health plan beneficiary numbers;</li> <li>9. Account numbers;</li> <li>10. Certificate or license numbers;</li> <li>11. Vehicle identifiers and serial numbers, including license plate numbers;</li> <li>12. Device identifiers and serial numbers;</li> <li>13. Web Universal Resource Locators (URLs);</li> <li>14. Internet Protocol (IP) address numbers;</li> <li>15. Biometric identifiers, including finger and voice prints; and</li> <li>16. Full face photographic images and any comparable images.</li> </ol>
<b>Marketing</b>	<ol style="list-style-type: none"> <li>1. Communication regarding a product or service that encourages recipients of the communication to purchase or use the product or service, unless the communication is made: <p>To describe a health-related product or service (or payment for such product or service) that is provided by UW Medicine including communications about the entities participating in a health care provider network;</p> <ol style="list-style-type: none"> <li>i. For treatment of the individual; <b>or</b></li> <li>ii. For case management or care coordination for the individual, or to direct or recommend alternative treatments, therapies, health care providers, or settings of care to the individual.</li> </ol> </li> <li>2. An arrangement between UW Medicine and any other entity whereby UW Medicine discloses protected health information to the other entity, in exchange for direct or indirect remuneration, so that the other entity or its affiliate to make a communication about its own product or service that encourages recipients of the communication to purchase or use that product or service.</li> </ol>
<b>Minimal Risk for Research</b>	<p>Minimal risk means that the probability and magnitude of harm or discomfort anticipated in the research are not greater in and of themselves than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests. [45 CFR 46.102(i)]</p>
<b>Minimum Necessary Standard</b>	<p>When using or disclosing PHI, UW Medicine must make reasonable efforts to limit PHI to the minimum necessary to accomplish the intended purpose of the use, disclosure or request.</p> <p>The minimum necessary standard does not apply to</p> <ul style="list-style-type: none"> <li>• Disclosures to or requested by a health care provider for treatment purposes</li> </ul>

Term	Definition
	<ul style="list-style-type: none"> <li>• To the patient or pursuant to an authorization</li> <li>• Uses and/or Disclosures required by law</li> <li>• Uses or disclosures that are required for compliance to the privacy standards.</li> </ul>
<b>More stringent</b>	<p>When comparing HIPAA and Washington state law, more stringent means a state law that meets one of the following criteria:</p> <ol style="list-style-type: none"> <li>1) With respect to a use or disclosure, the law prohibits or restricts a use or disclosure in circumstances under which such use or disclosure otherwise would be permitted under HIPAA, except if the disclosure is:               <ol style="list-style-type: none"> <li>a. Required by the Secretary of US Department of Health and Human Services in connection with determining whether UW Medicine is in compliance with HIPAA; <b>or</b></li> <li>b. To the individual who is the subject of the individually identifiable health information.</li> </ol> </li> <li>2) With respect to the rights of an individual, who is the subject of the individually identifiable health information, regarding access to or amendment of individually identifiable health information, permits greater rights of access or amendment, for the individual.</li> <li>3) With respect to information to be provided to an individual who is the subject of the individually identifiable health information about a use, a disclosure, rights, and remedies, provides the greater amount of information.</li> <li>4) With respect to the form, substance, or the need for express legal permission from an individual, who is the subject of the individually identifiable health information, for use or disclosure of individually identifiable health information, provides requirements that narrow the scope or duration, increase the privacy protections afforded (such as by expanding the criteria for), or reduce the coercive effect of the circumstances surrounding the express legal permission, as applicable.</li> </ol> <p>With respect to record keeping or requirements relating to accounting of disclosures, provides for the retention or reporting of more detailed information or for a longer duration.</p> <p>With respect to any other matter, provides greater privacy protection for the individual who is the subject of the individually identifiable health information.</p>
<b>Organized Healthcare Arrangement</b>	<ul style="list-style-type: none"> <li>◆ A clinically-integrated care setting in which individuals typically receive healthcare from more than one health care provider;</li> </ul> <p><b><u>OR</u></b></p> <ul style="list-style-type: none"> <li>◆ An organized health care system in which more than one covered entity participates, and which the covered entities are publicly known to jointly work together and participate in one of the following as a joint activity:               <ul style="list-style-type: none"> <li>➤ Utilization review,</li> <li>➤ Quality assessment and improvement,</li> </ul>               Payment activities when the financial risk is shared.             </li> </ul>

Term	Definition
<b>Patient</b>	<ul style="list-style-type: none"> <li>◆ A UW Medicine patient is any individual who receives health care services through any one of UW Medicine’s health care facilities. Health care services means any care, services or supplies related to the health of an individual and may include participants and/or subjects in clinical research activities.</li> </ul>
<b>Patient Condition – General Terms<sup>1</sup></b>	<ul style="list-style-type: none"> <li>◆ <u>Undetermined</u>: Patient awaiting physician assessment</li> <li>◆ <u>Good</u>: Vital signs are stable and within normal limits. Patient is conscious and comfortable. Indicators are excellent.</li> <li>◆ <u>Fair</u>: Vital signs may be unstable and not within normal limits. Patient is acutely ill. Indicators are favorable.</li> <li>◆ <u>Serious</u>: Vital signs may be unstable and not within normal limits. Patient is acutely ill. Indicators are questionable.</li> <li>◆ <u>Critical</u>: Vital signs are unstable and not within normal limits. Patient may be unconscious. Indicators are unfavorable.</li> </ul>
<b>Payment</b>	<p>“Payment” is defined as all activities undertaken by UW Medicine to obtain reimbursement for treatment that has been provided including the following activities:</p> <ul style="list-style-type: none"> <li>◆ Eligibility determination for coverage,</li> <li>◆ Coordination of benefits among third-parties and patients for cost- sharing responsibilities,</li> <li>◆ Adjudication or subrogation of health benefit claims,</li> <li>◆ Risk adjustment of amounts due,</li> <li>◆ Payment under a contract for reinsurance,</li> <li>◆ Healthcare data processing that supports billing, claims management and collection,</li> <li>◆ Utilization reviews.</li> </ul>
<b>Personal Representative</b>	<p>Personal representatives are those individuals who have authority to act on behalf of an individual with respect to health care decisions under state law.</p>
<b>Protected Health Information (PHI)</b>	<p>Protected health information is a subset of individually identifiable health information maintained in permanent health records and/or other clinical documentation in either paper-based or electronic format.</p>
<b>Privacy Coordinator</b>	<p>Each entity within UW Medicine has designated a Privacy Coordinator who assists the UW Privacy Officer develop and implement UW Medicine’s policies and procedures. The Privacy Coordinator may identify or appoint designee(s) to assist in the performance of these functions.</p>
<b>Privacy Officer</b>	<p>UW Medicine has designated a Privacy Officer who is responsible for the development and implementation of the policies and procedures of the entity as well as the education of the workforce. The Privacy Officer has a Privacy Coordinator at each UW Medicine entity to assist in the performance of the Privacy Officer’s duties.</p>
<b>Psychotherapy Notes</b>	<p>Psychotherapy notes are notes, recorded in any medium, by a mental health professional, 1) analyzing or detailing the explicit contents of conversation during a private counseling session or a group, joint, or family counseling session, and 2) that are separated from the rest of the individual’s medical record. Examples of Psychotherapy Notes include documentation of intimate personal content, details of fantasies and dreams, process interactions, sensitive information about other individuals in the patient’s life, or the mental health provider’s personal reactions, hypotheses, or speculations as a result of a patient or group interaction.</p>

<sup>1</sup> American Hospital Association Media Advisory, November 8, 2001.

Term	Definition
<b>Public health authority</b>	Public health authority means an agency or authority of the United States, a State, a territory, a political subdivision of a State or territory, or an Indian tribe, or a person or entity acting under a grant of authority from or contract with such public agency, including the employees or agents of such public agency or its contractors or persons or entities to whom it has granted authority, that is responsible for public health matters as part of its official mandate.
<b>Research</b>	Research means a systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge. Activities that meet this definition constitute "Research", whether or not they are supported or funded under a program that is considered research for other purposes. For example, some "demonstration" and "service" programs may include research activities. This definition includes activities preparatory to the conduct of research; for example, activities conducted in support of grant or proposal preparation, pilot studies, and feasibility studies.
<b>TPO</b>	<b>T</b> reatment, <b>P</b> ayment or Health Care <b>O</b> perations – Term is a phrase used throughout the HIPAA privacy regulations. Each term is individually defined in these definitions.
<b>Treatment</b>	"Treatment" is defined as a health care provider's provision, coordination and management of health care and related services. These health care services cross the continuum of care and include but are not limited to primary and specialty outpatient care, inpatient hospitalization, step-down and extended facility care, emergency medicine, and referral activities.
<b>Use</b>	The sharing, employment, application, utilization, examination, or analysis of individually identifiable health information within UW Medicine.
<b>UW Medicine Entity</b>	UW Medicine includes the following entities: University of Washington Medical Center & Clinics; Harborview Medical Center & Clinics; UW Medicine Neighborhood Clinics (University of Washington Physicians' Network); UW Physicians' Sports Medicine Clinic; UW Physicians' Eastside Specialties Center; Hall Health Primary Care Center; University of Washington Physicians.
<b>UW Medicine Provider</b>	Includes all individuals who are directly or indirectly involved in providing health care services to a patient.
<b>Workforce</b>	Faculty, employees, trainees, students, volunteers, and other persons who perform work for UW Medicine, and whose work conduct is under UW Medicine's direct control regardless of whether or not they are paid by UW Medicine.

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**REFERENCES:**

- I. 45 CFR Part 160 and 164.
  - II. 45 CFR 46.102(i)
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UW Privacy Officer: \_\_\_\_\_ Date: \_\_\_\_\_  
 John A Coulter, Associate Vice President for Medical Affairs