



SUD Electronic Information System

PCNX Accounting of Disclosures Log Job Aid

Table of Contents

Overview 1

Accessing the Form in Sage 1

Form Layout 2

 ROI Information 3

 PHI To Be Disclosed 3

 Disclosure Details 5

 Recipient Information 9

 Notes 12

Submission and Pre-Display 12

Overview

The **Accounting of Disclosures Log** provides a template for tracking Protected Health Information (PHI) disclosures in accordance with applicable regulations including the Health Insurance Portability and Accountability Act (HIPAA) and [42 CFR Part 2.25](#). Under the Final Rule, providers are required to keep an account of disclosures and make them available to clients upon request. Note that verbal/oral disclosures are not required to be tracked.

Accessing the Form in Sage

Within Sage’s smart search bar, enter the prompt “accounting” or “accounting of disclosures” and select **Accounting of Disclosures Log** from the search results.



accounting

Advanced Client Search

Here is what I found: X

All 1 Clients 0 Staff 0 Forms 1

Forms

Undock	Name	Menu Option
	Accounting of Disclosures Log	/ Avatar PM / Client Management / Disclosure Management

If not currently in a client chart, there will be a prompt to search for and select a client.

Select Client

Q pcnx,yolanda

Client Name	Personal Pronouns	Date Of Birth	Primary Language
PCNX,YOLANDA (000289271)	Unknown	01/15/1971	01 - English

Then select the agency's episode.

✓ Selected Client : PCNX, YOLANDA (000289271)

Select Episode

Name: YOLANDA PCNX
ID: 289271
Sex: Female
Date of Birth: 01/15/1971

Episode	Program	Start	End
1	Recovery Inc	04/15/2025	

Form Layout

The **Accounting of Disclosures Log** is comprised of one (1) section and five (5) sub-sections which are noted on the upper left-hand panel of the form.

Accounting of Disclosures Log

ROI Information
PHI To Be Disclosed
Disclosure Details
Recipient Information
Notes

The fields in each sub-section of the form, and instructions for how to complete each field, are outlined below.

ROI Information

This sub-section contains one (1) field to document whether there is an associated Release of Information (ROI) that covers the disclosure.

Note that it is the provider's responsibility to review existing ROI records on file for the client and determine whether the requested PHI has been authorized for release. If PHI is disclosed and there is no active ROI that permits the release of that information, the disclosure must meet the criteria for [Uses and Disclosures Without Patient Consent](#), as outlined in 42 CFR Part 2 Subpart D.

ROI Information

Is an active ROI on file for the purpose of this disclosure? *

☐ Yes
 ☐ No

*Important: If No ROI is on file, disclosure must meet the criteria for **Uses and Disclosures Without Patient Consent** outlined in 42 CFR Part 2 Subpart D.*

Field	Description
Is an active ROI on file for the purpose of this disclosure? (Required)	A Yes/No selection to indicate whether there is an active Release of Information (ROI) on file that permits disclosure of the released information.

PHI To Be Disclosed

This sub-section contains two (2) fields and captures the specific categories of PHI that are disclosed. The categories listed are based on the available printouts in Sage, but other types of PHI that may not have an associated printout can also be captured.

PHI To Be Disclosed

Chart Items Disclosed *

All | Clear

Search

☐ 0 - Other (Please Specify)

☐ Admission (Outpatient)

☐ ASAM CO-Triage

☐ ASAM Comprehensive Assessment

☐ Client Other Healthcare Coverage

☐ Diagnosis

☐ Discharge and Transfer Form

☐ Drug Testing

☐ Financial Eligibility

☐ Monthly Activity Report

☐ Patient Acknowledgement

Please specify other chart item(s) disclosed

Field	Description
Chart Items Disclosed (Required)	A checklist of available printouts for a variety of forms in Sage. Select the specific chart record(s) that were released as part of the disclosure. If a particular type of record is not captured on the list, there is an “0 - Other (Please Specify)” option at the top of the list which enables the free text field below. Note that the number 0 was added to this entry to force it to the top of the list for easier visibility. Available chart items: • Admission (Outpatient) • ASAM CO-Triage • ASAM Comprehensive Assessment • Client Other Healthcare Coverage • Diagnosis • Discharge and Transfer Form • Drug Testing • Financial Eligibility • Monthly Activity Report • Patient Acknowledgement • Patient Medications • Problem List / Treatment Plan • Progress Note • Recovery Bridge Housing Discharge • Referral Connections • Release of Information – In Network • Reproductive Health

Field	Description
	• ROI for Legal Proceedings • ROI for Payment and Operations • ROI for Treatment and Care Coordination • Service Authorization Request • Service Connections Log • Update Client Data • Women's Health History • Youth and Young Adult Screener
Please specify other chart item(s) disclosed (Conditionally Required)	A free-text field to describe any records released that are not captured in the above checklist of chart items. Required if "0 – Other (Please Specify)" is selected for Chart Items Disclosed.

If "0 – Other (Please Specify)" is selected, there is a pop-up message notifying the user that additional details of the disclosed items must be specified. Click OK to acknowledge the message.

Confirm

For 'Other,' please specify what additional chart items were disclosed.

OK

Disclosure Details

This sub-section contains eight (8) fields and captures important details about the disclosure including the date of disclosure, method of disclosure, purpose of disclosure, who made the disclosure, and the date range of the records disclosed.

Disclosure Details

Date of Disclosure *

Disclosure Made By (Staff Name) *
Yolanda Cespedes-Knadle 2 (Ycespedesknadle2)

Disclosure Made By (Site) *
Select

Method of Disclosure *
Select

Please specify other method of disclosure

Purpose of Disclosure * ⓘ

All | Clear Search

- ☐ Legal Proceeding
- ☐ Managed Care Plan (MCP)
- ☐ Payment and Healthcare Operation
- ☐ Public Record Act (PRA)
- ☐ Self-Request
- ☐ Subpoena
- ☐ Treatment and Care Coordination

Date Range of Records Disclosed:

Records Disclosed From (Start Date) * **Records Disclosed To (End Date) ***

The Purpose of Disclosure field has a light bulb help message. Hovering over the light bulb will give a preview of the available information. Clicking on it will open a separate window. The light bulb help message provides guidance on selecting the appropriate purpose(s) of disclosure.

Note that disclosures related to payment/billing do not need to be captured in this disclosure log as billing disclosures are already available to the client in the SAPC Patient Access System. Select Payment and Healthcare Operation only when capturing healthcare operation activities (e.g., audits).

Purpose of Disclosure * ⓘ

All | Clear Search

The following can be used as a guide for selecting the appropriate purpose(s) of disclosure.... Click icon to see more

- ☐ Legal Proceeding
- ☐ Managed Care Plan (MCP)
- ☐ Payment and Healthcare Operation
- ☐ Public Record Act (PRA)
- ☐ Self-Request
- ☐ Subpoena
- ☐ Treatment and Care Coordination

Purpose of Disclosure

The following can be used as a guide for selecting the appropriate purpose(s) of disclosure:

- Legal Proceeding - purpose relates to a client's criminal, civil, legislative, or administrative legal proceeding(s)
- Managed Care Plan (MCP) - purpose relates to sharing information with a client's Managed Care Plan such as Health Net, Kaiser, etc.
- Payment and Healthcare Operation - purpose relates to health care operation activities such as audits
- Public Records Act (PRA) - purpose relates to requests from DPH's Custodian of Records associated with access to public records
- Self-Request - purpose relates to a client's request for a copy of their own records
- Subpoena - purpose relates to requests for records that are accompanied by a subpoena
- Treatment and Care Coordination - purpose relates to treatment and care coordination

Field	Description
Date of Disclosure (Required)	The date that the disclosure was made. Future dates are not permitted.
Disclosure Made By (Staff Name) (Required)	The name of the staff member that made the disclosure. This field automatically populates with the logged in user but can be edited if needed using the search feature (i.e., magnifying glass).
Disclosure Made By (Site) (Required)	A drop-down menu to select the program / site location of the staff member that made the disclosure. The menu is restricted to only those programs / site locations that correspond to the agency the user is logged into.

Method of Disclosure (Required)	A drop-down menu to select the method used to make the disclosure. Available methods of disclosure: • Electronic (email, SFTP, flash drive) • Fax • Mail • Other Electronic disclosure may include encrypted emails, Secure File Transfer Protocol (SFTP), flash drive with authentication controls, and other secure methods of electronic transfer. <i>Note: Verbal/oral disclosures do not need to be captured on this disclosure log.</i>
Please specify other method of disclosure (Conditionally Required)	A free-text field to specify a method of disclosure not captured in the above list. Required if “Other” is selected for Method of Disclosure.
Purpose of Disclosure (Required)	A checklist to indicate for what intended purpose(s) the disclosure was made. Available purposes of disclosure: • Legal Proceeding • Managed Care Plan (MCP) • Payment and Healthcare Operation • Public Record Act (PRA) • Self-Request • Subpoena • Treatment and Care Coordination <i>Note: This field has a light bulb help message with definitions to help guide selection of the most appropriate purpose(s) of disclosure. Disclosures related to payment/billing do not need to be captured in this disclosure log as billing disclosures are already available to the client in the SAPC Patient Access System. The Payment and Healthcare Operation selection should only be used to capture healthcare operation activities (e.g., audits).</i>

Records Disclosed From (Start Date) (Required)	The start date (i.e., the oldest date) of the record(s) being disclosed. Future dates are not permitted. For example, if records dated January 1, 2025 through December 31, 2025 are disclosed, the start date should be entered as 01/01/2025.
Records Disclosed From (End Date) (Required)	The end date (i.e., the latest date) of the record(s) being disclosed. Future dates are not permitted. For example, if records dated January 1, 2025 through December 31, 2025 are disclosed, the end date should be entered as 12/31/2025.

Recipient Information

This sub-section contains 12 fields and captures information about the recipient of the disclosed records. The intended recipient can be either another SAPC network agency or an external entity to the network such as an individual or organization.

Note that only one intended recipient can be documented in the log. If information is disclosed both to another SAPC agency and to an external entity, two separate logs must be completed.

Depending on whether the recipient is a SAPC agency or an external entity, only the fields associated with that recipient will be enabled. At minimum, the name of the SAPC agency or the name of the external entity is required to be completed. In addition, it is recommended to complete at least one contact field (i.e., address, email, phone, fax) depending on the information available and the method of disclosure.

Was disclosure made to another SAPC network agency or to an external entity? *

☒ SAPC Network Agency ☐ External Entity

SAPC Network Agency *

Select

Agency Contact Name

Agency Contact Address

Agency Contact Email

Agency Contact Phone Number Agency Contact Fax Number

External Entity Name (Individual or Organization)

External Entity Address

External Entity Email

External Entity Phone Number External Entity Fax Number

Was disclosure made to another SAPC network agency or to an external entity? *

☐ SAPC Network Agency ☒ External Entity

SAPC Network Agency

Select

Agency Contact Name

Agency Contact Address

Agency Contact Email

Agency Contact Phone Number Agency Contact Fax Number

External Entity Name (Individual or Organization) *

External Entity Address

External Entity Email

External Entity Phone Number External Entity Fax Number

Field	Description
Was disclosure made to another SAPC network agency or to an external entity? (Required)	Indicate whether information was disclosed to a “SAPC Network Agency” or to an “External Entity” such as an individual or organization outside of the SAPC network.
SAPC Network Agency (Conditionally Required)	A drop-down menu of all SAPC network agencies. Required when “Was disclosure made to another SAPC network agency or to an external agency?” is marked as SAPC Network Agency.

Field	Description
Agency Contact Name	A free-text field to indicate the name of the point of contact at the agency, if available. This may be an individual, department, or program within the agency.
Agency Contact Address	A free-text field to indicate the site address of the agency, if available.
Agency Contact Email	A free-text field to indicate the email address associated with the point of contact, if available.
Agency Contact Phone Number	A free-text field to indicate the telephone number associated with the point of contact, if available.
Agency Contact Fax Number	A free-text field to indicate the fax number associated with the point of contact, if available.
External Entity Name (Individual or Organization) (Conditionally Required)	A free-text field to indicate the name of the external entity, which may be an individual or an organization. Required when "Was disclosure made to another SAPC network agency or to an external agency?" is marked as External Entity.
External Entity Address	A free-text field to indicate the address of the external entity, if available.
External Entity Email	A free-text field to indicate the email address of the external entity, if available.
External Entity Phone Number	A free-text field to indicate the telephone number of the external entity, if available.
External Entity Fax Number	A free-text field to indicate the fax number of the external entity, if available.

Notes

This section consists of one (1) field and captures any relevant notes associated with the disclosure or any disclosure details that could not be captured elsewhere on the form.

Notes

Notes

Field	Description
Notes	A free-text field to capture relevant notes.

Submission and Pre-Display

After submitting the **Accounting of Disclosures Log**, the form will close and the user will automatically be returned to the main screen.

To view existing records for a particular client, search for the **Accounting of Disclosures Log** in the search bar. Select the client, and episode. A pre-display will show any existing records that have been submitted by the logged in user's agency.

The pre-display will list the date of disclosure, the site that made the disclosure, the purpose of the disclosure, and to whom the disclosure was made. As the disclosure log can only record one recipient for disclosed information, either the SAPC Network Agency column or the External Entity Name column (but not both) will be populated for a given record.

Selected Client : PCNX, YOLANDA (000289271)

Selected Episode: 1

Select Record

Name: YOLANDA PCNX

ID: 289271

Sex: Female

Date of Birth: 01/15/1971

Date of Disclosure	Disclosure Made By (Site)	Chart Items Disclosed	SAPC Network Agency	External Entity Name (Individual)
09/23/2026	1000 South Fremont Ave ALHAMBRA CA 91803-9998	Admission (Outpatient)&Discharge and Transfer Form		Dr. Primary Care