

Advanced Heart and Vascular Center			
Policies and Procedures			
Policy Code: IM.005		Minimum Necessary Use and Access of Protected Health Information	
Approved By: Sandra Germany, Administrator	Effective Date: 06/18	Review Date: 5/26	Revision Date:

PURPOSE

To provide AHVC staff and employees guidelines for using or disclosing only the minimum amount of Protected Health Information (“PHI”) necessary to accomplish the intended purpose of the access, use, and/or disclosure.

POLICY

AHVC staff and associates will only access, use, or disclose the minimum PHI necessary to perform his/her designated role, regardless of the extent of access provided to him/her. Other individuals include, but are not limited to, students, temporary employees, business associates, volunteers, consultants, contractors, and subcontractors.

PROCEDURE

- Minimum necessary system access will be supported through authorization, access, and audit controls (such as role-based access) and implemented for all systems that contain identifiable PHI. Within the permitted access, an individual system user will only access the information needed to perform his/her job functions.
 - AHVC will categorize its workforce (employees, physicians, etc.) by the PHI access needed to perform their job duties and responsibilities
 - Each department will determine its minimum necessary requirements for PHI, based upon the user's job function or role.
- For disclosures and requests made on a non-routine basis, the PHI provided will be limited to what is reasonably necessary to accomplish the purpose of the disclosure.
- For disclosures and requests made on a routine and recurring basis, AHVC will create, implement, and maintain policies, procedures, or protocols that limit the PHI to the amount reasonable necessary to achieve the purpose of the disclosure.
- When requesting PHI from an outside source, AHVC will limit the requests to the amount reasonably necessary.

- Any potential inappropriate use of PHI will be reported immediately to the Administrator.

REFERENCES

45 CFR 164.502