

TEXAS ASSOCIATION OF COUNTIES HEALTH AND EMPLOYEE BENEFITS POOL HIPAA POLICIES

MINIMUM NECESSARY DISCLOSURES OF PROTECTED HEALTH INFORMATION

Effective Date: March 17, 2003

POLICY

The Texas Association of Counties Health & Employee Benefits Pool ("HEBP") Health Plan and its Business Associates will disclose only the minimum amount of Protected Health Information ("PHI") necessary to achieve the purpose of the disclosure.

PROCEDURE

Routine and recurring disclosures of PHI

- HEBP has identified disclosures of PHI it makes on a routine and recurring basis.
- HEBP has determined the minimum amount of PHI that is needed to achieve the purpose of these requests.

Non-routine disclosures of PHI

- HEBP reviews non-routine requests for disclosures of PHI that are subject to the minimum necessary standard on a case-by-case basis.
- The request for disclosure is forwarded to the Privacy Official (or designee) to determine if the amount of PHI requested is the minimum necessary to achieve the purpose of the disclosure according to established criteria.
- HEBP relies on representations that the PHI requested is the minimum amount necessary if the request is for a permitted disclosure from a public official; a Health Care Provider, a Health Plan, or a Health Care Clearinghouse; or a professional providing services to HEBP who is a Business Associate and who represents that the PHI requested is the minimum necessary.

- When necessary or appropriate, the Privacy Official will speak with a representative from the entity making the request to get clarification and/or modifications.

Disclosures of entire medical record

- HEBP does not disclose a participant's entire medical record in fulfillment of any request subject to the minimum necessary standard for any reason unless a specific justification for such a disclosure is documented.