

TEXAS ASSOCIATION OF COUNTIES HEALTH AND EMPLOYEE BENEFITS POOL HIPAA POLICIES

MINIMUM NECESSARY REQUESTS FOR PROTECTED HEALTH INFORMATION

Effective Date: March 17, 2003

POLICY

Texas Association of Counties Health and Employee Benefits Pool (HEBP) requests the minimum amount of Protected Health Information ("PHI") necessary to achieve its purpose from other Covered Entities.

PROCEDURE

Routine and recurring requests for PHI

- HEBP has identified requests for 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.
- When HEBP requests PHI, the Covered Entity or Business Associate to whom the request is made may rely on HEBP's determination that the amount of PHI requested is the minimum necessary to achieve the purpose of the request.

Non-routine requests for PHI

- HEBP reviews the non-routine requests it makes for disclosures of PHI on a case-by-case basis.
- The Privacy Official (or designee) reviews non-routine requests made by HEBP for PHI from another Covered Entity to ensure that the amount of PHI requested is the minimum necessary to achieve the purpose of the request according to established criteria.

Requests for entire medical record

- HEBP does not request a participant's entire medical record for any purpose unless a sufficient justification for such a disclosure is documented.