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|  MINIMUM NECESSARY DISCLOSURES OF PHI  | NO.  |
| In conformance with HIPAA privacy standards, it is the policy of American Health Enterprises, Inc. and its affiliated entities to make reasonable efforts to limit the disclosure of Protected Health Information (PHI) to the minimum necessary to accomplish the intended purpose of a use, disclosure or request. Although the minimum necessary requirement does not apply to disclosures made for treatment purposes, it is the practice of the organization to supply the minimum necessary PHI for those users identified as included in the minimum necessary, defined as those individuals that actually need access to the PHI they currently receive. This includes minimum necessary access to hardware and software applications (refer to related policies under Security / Safeguards tab). The organization observes the following disclaimer: the minimum necessary standard does not apply to disclosures to or requests by a health care provider for treatment; uses or disclosures made to the individual; uses or disclosures made pursuant to an authorization requested by the individual; disclosures and uses required for compliance with HIPAA including standard transactions; uses or disclosures that are required for compliance with the regulations. It is the policy of the organization that the minimum necessary standard includes health care staff who may orally coordinate services at nursing stations or report information by telephone to a patient’s physician, family member or provider of treatment (refer to related policies on the prevention of incidental disclosure of PHI); health care professionals who may discuss a patient’s condition during treatment rounds or care conferences, and/or health care professionals who may discuss the results of lab tests or other clinical procedures with a patient or other provider in a joint treatment area. Notices of admissions / discharges will routinely include the minimum information necessary to coordinate treatment and services. Other routine disclosures are included in the organization’s privacy notice. An analysis of those included in the minimum necessary are defined below. The minimum necessary standard does not require that this analysis be completed for routine requests or disclosures necessary for the purposes of care /treatment, payment and health care operations. However, the following are those individuals identified as those determined to require access to the information noted to carry out their job duties, as well as conditions appropriate to granting such access. (This list does not include designated business associates). |
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|  MINIMUM NECESSARY DISCLOSURES OF PHI  | NO.  |
| Electronic and/or Hard Copy Medical Records System: Licensed nurses, Director of Nursing, MDS Coordinator, Care Plan Coordinator / Medical Records Secretary, Dietary Manager / Dietitian, Social Services staff, Recreational Therapy staff, Admissions Coordinator, licensed therapists or therapy assistants, transdisciplinary therapists, Day Treatment director and trainer, QMRP, corporate IT Coordinator, Administrator, Clinical Coordinator / Regulatory Compliance Coordinator. Access to electronic medical records will be password protected. Physical safeguards will be placed on hard copy medical records to limit access to those identified as included in the minimum necessary. Hard copy medical records will be locked, with keys issued to those noted. A sign-in, sign-out record for medical records will be used.Genecare system: Office Manager, Receptionist / Secretary, corporate Patient Accounts Manager, corporate IT Coordinator, AdministratorInventory system: Inventory Control Coordinator, Office Manager, corporate Patient Accounts Manager, corporate IT Coordinator, Administrator.E-mail & Voice Mail Systems: Those noted above, including Environmental Services managers, IT assistants, Personnel Coordinator, Assistant Administrator and Transportation Coordinator, and corporate / executive staff. For other non-routine requests and disclosures not listed above, it is the policy of the organization to determine and limit disclosure to the minimum amount of PHI necessary to accomplish the purpose of the non-routine disclosure. This evaluation will generally be made on a need-to-know basis.It is the position of this organization that the Minimum Necessary Standard is considered a reasonableness standard that calls for an approach that is consistent with other best practices, guidelines and confidentiality policies currently in place which limit the unnecessary sharing of medical information.  |
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