

Communication Sciences and Disorders, Speech-Language-Hearing Clinic

Policies and Procedures

*SUBJECT:* HIPAA – MINIMUM NECESSARY—Policy #3

When using or disclosing protected health information (PHI) or when requesting PHI from another covered entity, Speech-Language-Hearing Clinic staff will make reasonable efforts to limit PHI to the minimum necessary to accomplish the intended purpose of the use, disclosure, or request.

**When minimum necessary does not apply:**

1. Disclosures to or requests by a health care provider for treatment;
2. Uses or disclosures made to the individual, as permitted or required, but subject to C.F.R.164.524(a)(2) and C.F.R.164.524(a)(3) Reviewable and Unreviewable Grounds for Denial (see Policy #XX);
3. Uses or disclosures made pursuant to an authorization C.F.R. 164.508;
4. Disclosures made to the Secretary in accordance with subpart C of part 160;
5. Uses or disclosures required by law C.F.R. 164.512(a)
	1. A covered entity may use or disclose PHI to the extent that use or disclosure is required by law and the use or disclosure complies with and is limited to the relevant requirements of such law.
	2. A covered entity must meet the requirements described in C.F.R. 164.512 ( c) Disclosures about victims of abuse, neglect, or domestic violence, C.F.R. 164.512(e) Disclosures for judicial and administrative proceedings, C.F.R. 164.512(f) Disclosures for law enforcement.

PHI may contain but is not limited to medical information, educational records, psychological or psychiatric records, developmental and behavioral reports, discharge summary, imaging scans reports, neurology reports, genetic testing and treatment or tests.

The following Speech-Language-Hearing staff has access to protected health information as part of carrying out the duties of his or her job:

* Insurance Billing and Collections Specialist
* Administrative Associate
* Clinical Supervisors and faculty