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**HIPAA Privacy – Minimum Necessary Disclosures of PHI**

**AD.HP25**

**POLICY:**

Co-workers and business associates disclose the minimum amount of protected health information (PHI) necessary to achieve the purpose of the disclosure.

**PROCEDURE:**

***Routine and recurring disclosures of health information***

1. Lifesong Hospice and Palliative Care has identified disclosures of health information it makes on a routine and recurring basis that are not related to treatment.
2. Lifesong Hospice and Palliative Care has determined the minimum amount of health information that is needed to achieve the purpose of these disclosures.

***Non-routine disclosures of health information***

1. Lifesong Hospice and Palliative Care reviews non-routine disclosures of health information that are not related to treatment on a case-by-case basis unless the patient has authorized the disclosure.
2. The request for disclosure is forwarded to the Privacy Officer or designee to determine if the amount of health information is the minimum necessary to achieve the purpose of the disclosure according to established criteria.
3. Lifesong Hospice and Palliative Care relies on representations that the information requested is the minimum amount necessary if the request is from a public official, a health care provider, a health plan, a professional providing service to Lifesong Hospice and Palliative Care as a business associate, or a researcher who provides appropriate documentation.
4. When necessary or appropriate, the Privacy Officer or designee will speak with a representative from the entity making the request for clarification and/or modifications.

***Disclosures of entire medical records***

1. Lifesong Hospice and Palliative Care does not disclose an individual's entire medical record in fulfillment of any request not related to treatment for any reason unless a justification for such a disclosure is documented.

Created:	Reviewed:	Revised:	Effective:
05/2018	11/2018		4/2019