



ADMINISTRATIVE PRACTICES MANUAL

Minimum Necessary for Access, Use and Disclosure Policy

PURPOSE

To limit the use, access, request, and disclosure of Protected Health Information (PHI) to the minimum necessary.

PROCEDURE

1. When using, accessing, requesting, and disclosing PHI, workforce members will limit their use, access, requests for, and disclosure of PHI to the minimum necessary to accomplish their assigned job duties.
2. Workforce members will make an individual determination of what amount of PHI meets the minimum necessary standard for requests by considering the requestors purpose and whether de-identified PHI would satisfy the purpose of the request.
3. The minimum necessary requirements do not apply in the following circumstances:
 - a. Requests by or disclosures to a health care provider for treatment;
 - b. Client/patient requests to access their own information;
 - c. Information requested and disclosed as a result of an authorization initiated by the client/patient;
 - d. Disclosures to the Secretary of the U.S. Department of Health and Human Services or related entities such as the Office of Civil Rights;
 - e. Use and disclosures required by law; and
 - f. To meet the requirements of HIPAA, such as for the content of standard transactions.
4. Workforce members are given access to the PHI needed to perform their job duties through the **Network Access Request Form (NARF)**. Workforce members needing access to PHI should contact their department's DCIM Security Contact to request the change in their access. Workforce members will not use this access to look up their own, their family, or anyone else's PHI unless it is an assigned job duty.
 - a. When a workforce member's duties change their access will be reviewed and updated.
 - b. Dane County will make reasonable efforts to use software access controls to limit the workforce members' access to PHI that is necessary to carry out assigned duties.
 - c. Requests for access to PHI not routinely covered in the scope of the workforce member's position shall be reviewed and approved by their supervisor and/or the department DCIM Security Contact to determine whether the request is appropriate. If the request is for a limited or temporary basis, the workforce member's supervisor shall be responsible for notifying DCIM and/or City of Madison's IT regarding changes in timeframe or scope of the limited/temporary access using the **Network Access Request Form (NARF)**.

- d. Dane County will monitor access to determine appropriateness of staff access to and use and disclosure of PHI. Methods for auditing access may include:
 - i. Conducting random spot-checks to determine appropriateness of staff access;
 - ii. Using audits to determine time of access, length of access, access to sensitive or “VIP” client/patient PHI;
 - iii. Reviewing “role-based” access by position and unit of assignment within the organization; or
 - iv. Reviewing requests for and access to “hard copy” client/patient records.
- e. Workforce member access to PHI will be terminated according to **Network Access Request Form (NARF)**.

DOCUMENTATION

Dane County will maintain the documentation associated with this policy for a minimum of seven (7) years.

ROLES & RESPONSIBILITIES

The HIPAA Privacy & Security Officer is responsible for the implementation, maintenance, and adherence to this policy.

RELATED DOCUMENTS

Definitions
Network Access Request Form
Network Access Request Form – Human Services

DOCUMENT VERSION HISTORY

Original: 09/2023
Reviewed: 09/2024