PURPOSE:
To make reasonable efforts to limit protected health information (PHI) to the minimum amount necessary to accomplish the intended purpose of the use, access, or disclosure.

POLICY:
1. It is the policy of Health Quest Systems, Inc. and its affiliates (“HQ”) that, for all Uses, Access, or Disclosures to which this policy applies, HQ will not Use, Access, or Disclose an entire medical record, except when the entire medical record is specifically justified as the amount that is reasonably necessary to accomplish the purpose of the Use, Access, or Disclosure.

2. It is the policy of HQ to apply the minimum necessary protocols and criteria described in this policy to all uses, accesses, and disclosures for PHI with the exception of the following exempt uses and disclosures:
   a. Disclosures to or requests by a healthcare provider for treatment purposes.
   b. Uses or Disclosures made to the individual who is the subject of the information. This includes response to a request for access or an accounting of disclosures.
   c. Uses or Disclosures made pursuant to an Authorization signed by the individual patient or their Personal Representative.
   d. Uses or Disclosures that are required by law.
   e. Uses or Disclosures that are necessary to comply with the HIPAA Privacy Rules.
   f. Uses and Disclosures made to the Secretary of Health and Human Services (HHS) required for compliance and enforcement with the HIPAA the Privacy Rule.

3. The Minimum Necessary Rule applies:
   a. When using PHI internally within the covered entity.
   b. When disclosing PHI to an external party in response to a request (except for treatment).
   c. When requesting PHI from another HIPAA covered entity.

DEFINITIONS:
See HIPAA Glossary

ENFORCEMENT:
All individuals whose responsibilities are affected by this policy are expected to be familiar with
the basic procedures and responsibilities created by this policy. Failure to comply with this policy and related procedure may result in remedial and/or disciplinary action, up to and including termination of any employment or other relationship.

REFERENCES:
45 CFR Section 164.502(b)
45 CFR Section 164.514(d)
HQ 5.2.08 Minimum Necessary for Use and Disclosure Procedure

POLICY HISTORY:
Supersedes: 2/13/2019
Original Implementation Date: 2/2010
Date Reviewed: 2/13/2019
Date Revised: 2/27/2014, 2/13/2019, 2/28/2020

APPROVAL:

Wayne K. Williams
Policy Owner

2/28/20
Date