AGENCY POLICY:
MINIMUM NECESSARY STANDARD

SCOPE OF POLICY
This policy applies to all employees, trainees, volunteers, consultants, contractors, students and subcontractors at the agency.

This policy talks about using and sharing protected health information. “Protected health information” means information about someone we support that:

- Identifies who they are AND
- Has something to do with their health.

It is sometimes called PHI.

STATEMENT OF POLICY
“Minimum necessary” means that staff can only use or share the amount of PHI that they need to do their job. Example: if a staff only needs to know about a person’s recent hospital stay, they can’t hear about something that happened to the person as a child.

IMPLEMENTATION OF POLICY

Things that people do regularly:

As a member of our agency staff, you routinely use protected health information about persons served to carry out your duties. You may also need to disclose protected health information about people served to persons outside the agency or to request protected health information from these individuals. The agency and your department have specific policies and procedures explaining how much information may be used, disclosed or requested in situations that occur on a routine basis. You are expected to know and follow these policies at all times. These policies have been carefully developed and are not intended to limit any communications required for agency staff to provide quick, effective and high quality health care. If you have any questions about how these policies should be applied in a particular situation, contact your department supervisor or the Privacy Officer.

Non-Routine Situations
Please cross reference the policy , “Minimum necessary standard in non-routine situations”

VIOLATIONS
The agency’s Privacy Officer has general responsibility for implementation of this policy. Members of our agency staff who violate this policy will be subject to disciplinary action up to and including termination of employment or contract with The Arc of Monroe County. Anyone who knows or has reason to believe that another person has violated this policy should report the matter promptly to his or her supervisor or the agency’s Privacy Officer. All reported matters will be investigated, and, where appropriate, steps will be taken to remedy the situation. Where possible, The Arc of Monroe County will make every effort to handle the reported matter confidentially. Any attempt to retaliate against a person for reporting a violation of this policy will itself be considered a violation of this policy that may result in disciplinary action up to and including termination of employment or contract with The Arc of Monroe County.

Effective Date: 4/1/03
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