

Diane E. Reddin, OD
North Fork Vision Center, PC
210 E. Bridge Street
Hotchkiss, CO 81419
970.872.2020

MINIMUM NECESSARY USES AND DISCLOSURES OF PHI

Policy Number: 24A

Effective Date : 4/14/03

In order to comply with HIPAA's Privacy Rule, it is the policy of this office to only use or disclose the minimum amount of protected health information necessary to accomplish the purpose for the use or disclosure, under the conditions and exceptions described in this policy.

1. People in the following job categories will only have access to the kind or amount of protected health information indicated:

- a. All doctors and technicians, including vision therapists – any and all protected health information, including the entire clinical chart, for treatment purposes.
- b. Coders/billers – fee slips and the written diagnosis in the clinical chart.
- c. Opticians – prescription information, and notes in the clinical chart concerning the treatment plan.

2. We will keep all clinical charts and billing records secure when they are not in use. They will be stored behind the front desk where only authorized personnel can access them. We require that no patient information be visible on any computer when the user is away from the workstation. Staff are prohibited from talking about our patients in public areas.

3. All staff will sign a “confidentiality agreement” indicating their commitment to access only the minimum amount of protected health information necessary for them to do their job, and to abide by the restrictions listed in paragraph 2. Violation of this agreement is grounds for employee discipline according to our personnel policies.

4. Whenever we get a request from a third party for protected health information about one of our patients, or whenever we intend to make a unilateral disclosure of protected health information about one of our patients, we will disclose only the minimum necessary amount of protected health information necessary to satisfy the purpose of that disclosure. This does not apply in the following cases:

- a. The patient has authorized the disclosure.
- b. The disclosure is for treatment purposes (for example, disclosures to a consultant or follow-up health care provider).

5. We will disclose only the indicated protected health information in response to the following routine kinds of disclosures that we make:

a. Prescription verifications:

For glasses: Date of prescription, power, lens material and type, lens treatments, seg height, base curve, pupillary distances, and frame specifications.

For contact lenses: Expiration date, base curve, power, diameter, material or brand, and any other information necessary to replace the patient's lenses.

6. We will rely upon the representations of the following third parties that they have requested only the minimum amount of protected health information necessary for their purposes:

a. Another health care provider or health plan.

b. A public official, like a law enforcement officer.

c. Professionals providing services to us (such as attorneys or accountants).

7. Dr. Reddin is responsible for determining what is the minimum amount of protected health information necessary for us to disclose in situations that are not routine. Dr. Reddin will consider the reason for the disclosure, whether it falls into any of the circumstances described in paragraph 4 of this policy, and the protected health information that we have, in making this determination.

8. Whenever we request protected health information about one of our patients from someone else, we will ask for only the minimum necessary amount of protected health information necessary for us to accomplish the purpose that prompted us to ask for the information.