



Oklahoma State University

Title: Minimum Necessary Access and MyHealth	Policy #: PRV-07.04
Category: HIPAA Compliance	Authority: 45 CFR § HIPAA SECTION: 164.514(d) and (e)
Standard: Minimum Necessary	Responsibility: Health Care Components
Effective Date: 12/1/2012	Page 1 of 2
Approved By: OSU Legal Counsel	Revised: 7/1/2013

PURPOSE:

To identify appropriate Uses and Disclosures in relation to MyHealth Access Network.

POLICY:

OSU CHS is a participant of the MyHealth Access Network, Health Information Exchange. As such, we have agreed to fully comply with all applicable laws and MyHealth policies and procedures and promulgate the internal policies required for such compliance in order to provide essential privacy protections for patients with respect to accessing only the minimum necessary information from the MyHealth Access Network to accomplish the intended purpose for which the information was accessed. OSU-CHS faculty/staff who have access to MyHealth via OSU-CHS, are not to login to MyHealth for treatment purposes of a patient at a facility outside of OSU-CHS that is not a MyHealth Participant.

PROCEDURE:

A. Uses

1. Each Authorized user will, when using or disclosing PHI, or requesting PHI from another Participant in MyHealth, limit the disclosure of PHI, to the extent practicable, to the Limited Data Set, or will use or disclose only the minimum amount of PHI obtained through MyHealth as necessary to accomplish the intended purpose for which the information was accessed.
2. OSU will allow access to such information by only those identified Workforce members, agents, and contractors who need the PHI in connection with their job function or duties.

B. Disclosures by MyHealth for Public Health Reporting and Healthcare Operations of Participants

MyHealth will disclose only the minimum amount of information necessary for the purpose of meeting public health reporting and healthcare operations requirements. To the extent practicable, disclosure of PHI will be limited to the Limited Data Set or, if more information is needed, the disclosure will be limited to that necessary to accomplish the intended purpose of the disclosure.

C. Disclosures for Treatment Purposes and Required by Law



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The minimum necessary standard does not apply to disclosures of PHI made for treatment purposes or disclosures required by law.

D. De-identified Information

This Policy does not apply to the use or disclosure of or requests for de-identified information.

REFERENCES:

45 CFR 164.514(d) and (e)
HITECH Act, Section 13405(b)(1)(A)
MyHealth Privacy and Security Glossary