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| **POLICY TITLE:**  | Minimum Use Necessary of Protected Health Information Policy - CP29 |
| **APPLIES TO:**  | All Clinical Staff at Caregiver Grove Behavioral Health  |
| **EFFECTIVE DATE:**  | December 1, 2018 |
| **ANNUAL** **REVIEW DATE:**   | January 1 (each calendar year) Updated: January 21, 2024 Reviewed: July 1, 2019 Reviewed: July 29, 2024 |
| **PURPOSE:**  | The purpose of Caregiver Grove Behavioral Health’s Minimum Use Necessary of Protected Health Information (PHI) policy is to protect and limit the client’s PHI disclosed or used to accomplish the intended purpose.  |
| **DEFINITION:**  | Caregiver Grove Behavioral Health Minimum Use Necessary of PHI policy ensures that the client’s PHI follows the minimum use necessary for treatment.  |
| **POLICY**  | **Policy:** Caregiver Grove Behavioral Health will follow the privacy rule regulations when PHI is used or disclosed by using the minimal amount of PHI necessary to conduct health care activities. Caregiver Grove Behavioral Health Behavioral will make reasonable efforts to limit the amount of PHI by applying the minimum use necessary to accomplish the intended purpose of the use, request, or disclosure. Caregiver Grove Behavioral Health will not disclose the entire health record except when requested and specifically indicate the intended purpose for the use, disclosure, or request of the entire record. For any type of disclosure made on a routine basis, Caregiver Grove Behavioral Health has guidelines to limit the use and disclosure of PHI to the amount reasonably necessary to achieve the purpose of the use or disclosure.  The written procedures in this policy identify the types of information to be disclosed, the types of persons who can receive the PHI, and the conditions that would apply for access. Caregiver Grove Behavioral Health personnel must review the guidelines in this policy during orientation and must follow all policies and procedures regarding confidentiality. **Procedure** **Office Manager/Administrative Support** The Office Manager or other designated staff must have access to the following minimum necessary PHI to perform their duties: 1. The client’s name, address, and phone number
2. Date of the appointment
3. Insurance/third-party payer information
4. Raw testing data
5. Diagnosis
6. Type of service received.
7. Number of sessions attended.
8. Physician’s name and address
9. Psychiatrist’s name and address
10. Discharge summaries
11. The reason for referral
12. The client’s intake information (for purposes of making sure information is completed)
13. The billing ledger, which may include outstanding balance and/or payments made (for certain health insurance plans)

 **Billing**  The Billing Department must have access to the following minimum necessary PHI to perform their duties related to services rendered: 1. The client’s name, address, and phone number
2. The client’s date of birth
3. The client’s Social Security number
4. The client’s insurance company information including the policy number.
5. Guarantor name and address and relationship to the insured, if not the client
6. Client or authorized representative’s employer
7. The amount of the copayment and/or coinsurance
8. Diagnosis code
9. The provider’s name
10. Dates and time limits of sessions
11. Procedure code
12. Reason for referral

 The Compliance department or other designated staff must have access to all of the information that support staff and billing have access to due to this position’s supervisory role of oversight of all non-clinical staff functions. This area also has access to electronic PHI records for the purpose of auditing and administrative peer review to ensure that all documents have been completed and signed in a timely fashion and to collect necessary data. **Clinical Staff** Caregiver Grove Behavioral Health’s clinical staff will limit the disclosures of the client’s PHI to the minimum necessary when interacting with non-clinical staff. There are no limits placed on clinical staff when disclosing PHI for purposes of consultation and/or coordination of treatment with other Caregiver Grove Behavioral Health clinicians. When Caregiver Grove Behavioral Health clinical staff are consulting about clients, it must occur in a private setting.  |
| **APPLICABLE STANDARDS:** | CARF 1.K.a,b; 1.K.8.c; HIPAA |
| **EXCEPTIONS:**  |   |
| **APPROVERS:**  |  John Tooson IV | Chief Executive Officer (CEO)Arnethia Levey | Vice President, Program Development & Compliance |