



Administrative Policy

2003-21 Minimum Necessary Protected Health Information

Title	Minimum Necessary Protected Health Information
Policy Owner and Contact Information	Office of Healthcare Compliance and Privacy privacyoffice@uchc.edu
Campus Applicability	UConn Health
Applies to	All UConn Health workforce members, including employees, faculty, staff, students, residents, volunteers and other individuals with approved access to Protected Health Information.
Effective Date	1/4/2021

PURPOSE:

To ensure that the amount of Protected Health Information (PHI) requested, used or disclosed is limited to the minimum necessary to accomplish the intended purpose of that use, disclosure or request (Minimum Necessary) in accordance with the Health Insurance Portability and Accountability Act of 1996 and the associated regulations (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH).

POLICY STATEMENT:

UConn Health must use, disclose, and request only the Minimum Necessary amount of PHI, with the exception of:

- a. Disclosures to or requests by a health care provider for treatment.
- b. Disclosures to the individual who is the subject of the information.
- c. Uses and disclosures made pursuant to a valid authorization.
- d. Uses and disclosures required for compliance with HIPAA.
- e. Disclosures to the U.S. Department of Health and Human Services (HHS) as required by the Privacy Rule for enforcement purposes.
- f. Any other use or disclosure required by law.

UConn Health identifies persons or classes of persons in its workforce who need access to PHI to carry out their duties and makes reasonable efforts to limit their access to the category or categories of PHI needed.

DEFINITIONS:

[Privacy Definitions](#)

PROCEDURES/FORMS:

[Procedure for Policy 2003-21 Minimum Necessary Data](#)

REFERENCES:

45 CFR §§ 164.502(b) and 164.514(d) (HIPAA Privacy Rule)

RELATED POLICIES:

[UConn Health Information Security Policies](#)

ENFORCEMENT:

Violations of this policy or associated procedures may result in appropriate disciplinary measures in accordance with University By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, the University of Connecticut Student Code, other applicable University Policies, or as outlined in any procedures document related to this policy.

APPROVAL:

Andrew Agwunobi (Signed) _____
UConn Health Chief Executive Officer

1/4/2021 _____

Kiki Nissen (Signed) _____
Administrative Policy Committee Vice-Chair

12/22/2020 _____

Janel Simpson (Signed) _____
Administrative Policy Committee Chair

12/22/2020 _____

POLICY HISTORY:

New Policy Approved: 4/14/03

Revised: 6/15/05, 10/8/13, 1/4/21