

HEALTH INFORMATION PRIVACY POLICIES & PROCEDURES

There is **no minimum necessary** requirement for: disclosures to or requests by one another in our dental office or by a healthcare provider for treatment; permitted or required disclosures to, or for disclosures requested and authorized by, a patient; disclosures to HHS for compliance reviews or complaint investigations; disclosures required by law; or uses or disclosures required for compliance with the HIPAA Administrative Simplification Rules.

- a) **Routine or Recurring Requests or Disclosures** — Our dental office will follow the policies and procedures that we adopt to limit our routine or recurring requests for or disclosures of PHI to the minimum reasonably necessary for the purpose.
- b) **Non-Routine or Non-Recurring Requests or Disclosures** — No non-routine or non-recurring request for or disclosure of PHI will be made until it has been reviewed on a patient-by-patient basis against our criteria to ensure that only the minimum necessary PHI for the purpose is requested or disclosed.
- c) **Others' Requests** — Our dental office will rely, if reasonable for the situation, on a request to disclose PHI being for the minimum necessary, if the requester is: (a) a covered entity; (b) a professional (including an attorney or accountant) who provides professional services to our practice, either as a member of our workforce or as our **Business Associate**, and who represents that the requested information is the minimum necessary; (c) a public official who represents that the information requested is the minimum necessary; or (d) a researcher presenting appropriate documentation or making appropriate representations that the research satisfies the applicable requirements of the Privacy Rules.
- d) **Entire Record** — Our dental office will not use, disclose, or request an entire record, except as permitted in these Policies & Procedures or standard protocols that we adopt reflecting situations when it is necessary.
- e) **Minimum Necessary Workforce Use** — Our dental office will use only the minimum necessary PHI needed to perform our duties.

8. Business Associates

Our dental office will obtain satisfactory assurance in the form of a written contract that our **Business Associates** will appropriately safeguard and limit their use and disclosure of the protected health information (PHI) we disclose to them.

These **Business Associate** requirements are not applicable to our disclosures to a healthcare provider for treatment purposes. The **Business Associate Contract Terms** document contains the terms that federal law requires be included in each **Business Associate Contract**.

- a) **Breach by Business Associate** — If our dental office learns that a **Business Associate** has materially breached or violated its **Business Associate Contract** with us, we will take prompt, reasonable steps to see that the breach or violation is cured.