

# Stark County Board of Developmental Disabilities

HIPAA Procedure 15: HIPAA Internal Uses, Routine Uses and Disclosures of PHI	Effective: 4/14/2003
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## **Subject: HIPAA Internal Uses, Routine Uses and Disclosures of PHI**

A routine disclosure is a disclosure of Protected Health Information (PHI) to an employee that is a necessary part of the Board's operation and required for the care of the individuals served by the Board.

The Privacy Officer has prepared a Matrix reflecting internal routine access according to the following:

1. Classification of staff persons who will need access to the protected health information (PHI) in order to carry out their job duties.
2. Identification of the categories and types of PHI maintained by the Board and its departments.
3. Identification of the conditions, as appropriate, that will apply to the access of PHI by the staff on a routine basis.
4. Identification of the types of PHI that may be released to the classifications of staff persons.

Access to the Matrix will be provided to all staff.

The Case Records Administrator will consult the "matrix" prior to providing access to the PHI to confirm that the staff person has the individual on his/her case load and/or classroom prior to granting the access permitted as outlined in the matrix.

Access to information for an individual not on their caseload and/or classroom will require approval by the responsible Compliance Committee Member. This approval must be granted by using the [Information Request Form \(HIPAA-11\)](#). Any questions are to be directed to the Department Head or the Privacy Officer.

A routine disclosure of PHI may also be made to all Business Associates and Service Contractors, which is defined as a person or entity who performs or assists in the performance of a function or activity on behalf of the covered entity, and whose performance or assistance involves the use or disclosure of PHI. All Business Associates and Service Contractors shall provide satisfactory assurance that the PHI will be used only for the purposes, for which they were engaged, will safeguard the PHI from misuse, and comply with the requirements of the Health Insurance Portability and Accountability Act of 1996 as outlined in the Service Agreements by and between the Board and its Business Associates. After execution of the Service Agreement with the written assurances, the Board, by and through its employees, may disclose to a Business Associate PHI for the purposes as outlined in the Service Agreement for treatment, payment, or healthcare operations without obtaining the individual's authorization.

The Privacy Officer has the responsibility to update and make available the Matrix and Business Associate list to all staff.

