

**County Of San Diego**  
**Health and Human Services Agency (HHSa)**

**SUBJECT: Minimum Necessary Use and  
Disclosure of Protected Information**

**NO: HHSa-L-16**  
**PAGE: 1 of 1**  
**DATE: September 1, 2017**

**REFERENCE: Health Insurance Portability and Accountability Act (HIPAA); California Information Practices Act; various State Agreements.**

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**POLICY:** Only staff with an HHSa-approved, business-related reason may access, use, or share Protected Information. Staff shall access or use only the minimum necessary information to perform his/her designated duties, regardless of the extent of access authorized or available.

**RESPONSIBILITIES:** Privacy laws and regulations such as the Health Insurance Portability and Accountability Act (HIPAA) and the California Information Practices Act (CIPA) outline requirements regarding the confidentiality of and client's rights regarding Protected Information. Many Agency Programs also have Agreements with the State of California that outline additional confidentiality parameters. Compliance with these regulations is addressed in a series of Agency policies and procedures maintained by the Agency Compliance Office.

**DEFINITIONS:** See HHSa Policy L-30 "Privacy Definitions"

**QUESTIONS:** HHSa Privacy Officer at 619-338-2808

Approved:

  
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Christy Carlson  
Group Program Manager  
Agency Compliance Office