Policy Number: HC APPENDICES	Page: 1	Of: 3
Title: Appendix A: Minimum Necessary		
Regulatory Authority: HIPAA Regulations, FERPA Regulations, ORC, OAC		
Effective Date: 01/19/2021		
Reviewer/Job Title: Director of Operations		

APPENDIX A: MINIMUM NECESSARY – WORKFORCE, DISCLOSURES AND REQUESTS

Workforce Access to PHI and Safeguards

Person, Classes of Persons, or Business Associates	***Categories of PHI Needed***	***Additional Safeguards(*)***
Administration		
Superintendent	All	
Director of Operations	All	
Special Olympics Coordinator	All	
School Secretary	Computer data	Limited to report entries
SSA Secretary	Computer data	Limited to report entries
Service & Support		
Service & Support Director	All	
Service & Support Coordinators	All	
Nurse & LPN	All	

School		
Preschool Coordinator	records regulated under FERPA	
Classroom Instructors	records regulated under FERPA	
Instructor Assistants	records regulated under FERPA	
Language Development Specialist	Medical Needs, notes pertinent to speech/language	
Occupational Therapist	Medical needs, notes pertinent to service provision	
Physical Therapist Assistant	Medical needs, notes pertinent to service provision	
Physical Therapist	Medical needs, notes pertinent to service provision	
Early Intervention Specialists	All Early Intervention files	
Custodian	Medical Needs	
Transportation Staff	records regulated under FERPA	

Business Associates		
County Auditor's Office	records pertinent to bill payment	
Primary Solutions, Inc. Brittco Infalible GateKeeper	Database Data	
DODD	Medical needs	
NetGain	As needed for technical assistance	

*Safeguards: All employees will receive training on board confidentiality policies and will be subject to sanctions for violations. The table above lists additional safeguards that will be employed.

Policy Number: HC APPENDICES	Page: 1	Of: 2
Title: Appendix B: Procedures For Routine Disclosures and Requests Of PHI		
Regulatory Authority: HIPAA Regulations, FERPA Regulations, ORC, OAC		
Effective Date: 01/19/2021		
Reviewer/Job Title: Director of Operations		

APPENDIX B: PROCEDURES FOR ROUTINE DISCLOSURES AND REQUESTS OF PHI

Note: Disclosures to medical, vocational, residential and other providers, and service coordination with other agencies are "treatment" and not part of Minimum Necessary procedures.

1) **Software & Network Providers** – Information in the computer system is incidentally available during system support activities.
   A) **NetGain.** Network support vendor NetGain is under contract to provide 24/7 network support. Access is provided at all times.
   B) **Primary Solutions and other Support.** Primary Solutions and other support vendors will be granted access rights on an as needed basis. Technical solutions for implementing this authorization will be deployed by the board.
2) **Job and Family Services** – For services rendered, which are reimbursed by ODJFS, submit requested information to JFS.
3) **Health Department –** Contents of the early intervention file may be shared with the Health Department, upon their request, if the initial referral for services came through the Help Me Grow network.
4) **Prosecutor's Office**. When a warrant or subpoena is presented, any file may be released to the Prosecutor's Office. In addition, if the Board is seeking legal counsel, file contents to be revealed will be reviewed by the Privacy Officer to ensure that minimum necessary standards are being followed.
5) **Auditor's Office –** When authorizing payment of bills, fiscal files may be reviewed by the Auditor's office prior to authorization of payment.
6) **DODD** – Information will be shared routinely with Ohio DODD in order to ensure continuity of services for individuals. Specific to MUI case files, the Investigative Agent and internal UI staff will utilize the State's secure website to input required information.
7) **Surveyors** – Upon confirmation of surveyors credentials, the superintendent or his/her designee may authorize review of any files requested by the surveyor with the exception of MUI State Files.
8) **Transportation Providers –** To ensure quality of care for individuals, medical needs and guardian/family contact information will be shared with contracted providers.
9) **County School Districts –** Individual information will be shared, upon written request on

School District letterhead, if the request for services originated in the school district.

10) **Bureau of Disability Determination** – Using the Bureau's forms, assessment information will be shared in order to determine individual's eligibility for benefits.
11) **Attorneys** – When a subpoena is presented, the protocol in Disclosures that do Not Require an Authorization will be carefully followed to determine, with legal counsel assistance, if the subpoena should be honored.
12) **Other Outside Agencies** – In order to ensure continuity of services to individuals, the Director of SSA or the Director of Adult Services will share IP, medical limitation and incident reports with authorized contacts from Family Services.
13) **Law Enforcement** – As identified by the Director of Services & Supports, guardianship, family contact information and behavior support plans will be shared with law enforcement agencies. In addition, upon presentation of a warrant and verification of credentials if presented in person, other file information may be shared with law enforcement agencies. See Disclosures that do not Require an Authorization.

Procedures for Routine Requests of PHI

1) **Eligibility Inquiry** – Individual insurance eligibility will be verified by using procedures provided by the Ohio Department of Developmental Disabilities.

Policy Number: HC APPENDICES	Page: 1	Of: 1
Title: Appendix C: HCBDD Disclosure Log		
Regulatory Authority: HIPAA Regulations, FERPA Regulations, ORC, OAC		
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HCBDD Disclosure Log

Date	**Person or Entity receiving Records**	**Description of records disclosed**	**Purpose of disclosure**	**Description of threat to health or safety (if reason is in response to health or safety threat or emergency)**