**Minimum Necessary** Disclosure Decision Tree

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Is the requested information de-identified?  

Yes: De-identified information is information that has had the 18 data items stripped out or information that a person with appropriate knowledge and experience applies accepted statistical and scientific methods to render not individually identifiable. See UW Medicine Privacy Policy: **PP-19 Protected Health Information, Limited Data Set, and De-Identification of Protected Health Information**.

No: Limited Data Set requirements apply

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Does the requested information meet the specification for Limited Data Set?  

Yes: Limited Data Set requirements apply

No: Is the disclosure requested by a healthcare provider for Treatment?  

Yes: End: **Minimum Necessary standards do not apply**

No: Is the disclosure to:  
1) the individual  
2) to Secretary of DHHS  
3) required by law?  

Yes: End: **Minimum Necessary standards do not apply**

No: Is the request for disclosure routine or re-occurring?  

Yes: Establish standard document sets of information to be disclosed that limits the PHI to amount reasonably necessary to achieve the purpose of the disclosure.

No: Is the request for disclosure non-routine or non-recurring?  

Yes: Determine the purpose of the request. The information requested must be related directly to the stated purpose. For example, the entire medical record shall be disclosed only if it is clearly demonstrated that each part of the medical record is related to the reason the request is being made.

Identify and request the data elements required to fulfill that purpose of the request. To the extent possible, the request should be specific both as to the documents being requested and the applicable time period.

Verify that the minimum amount of data necessary to complete the request has been requested and that purpose could not be achieved by requesting de-identified information.

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See UW Medicine Privacy Policies PP-16a for information regarding the use & disclosure of Protected Health Information Permitted Without An Individual's Authorization.