

**Covered Entity’s Workforce Access to Protected Health Information
“MINIMUM NECESSARY”**

The HIPAA Privacy regulation requires organizations to limit workforce access to protected health information (PHI) to the minimum amount of PHI necessary to do their jobs.

Use this worksheet to identify your job categories (including volunteers), the PHI individuals in those categories currently can access, the minimum needed to do their jobs effectively, information currently accessed that is not needed, and any conditions that should apply to their access to PHI.¹

Job category	Categories of PHI Currently Accessed	Minimum PHI Needed for Job	Current PHI Accessed But Not Needed for Job	Conditions On Access
e.g., Appointment Scheduler	Entire medical record	Demographic, Billing	Clinical information	Demographic and billing information may only be accessed for appointment scheduling purposes.

THIS DOCUMENT SHOULD BE CONSIDERED ONE EXAMPLE OF HOW AN ORGANIZATION CAN START THEIR COMPLIANCE EFFORTS- IT IS INTENDED TO BE USED SOLELY AS A VEHICLE FOR DISCUSSION TO HELP COMPANIES DEVELOP THEIR OWN COMPLIANCE MATERIAL. THIS DOCUMENT IS PROVIDED AS GENERAL GUIDANCE AND DOES NOT CONSTITUTE LEGAL ADVICE. COMPANIES SHOULD CONTACT THEIR OWN LEGAL COUNSEL TO TAILOR THE DOCUMENT TO MEET THEIR SPECIFIC NEEDS.

¹NOTE: This analysis will be different for every health care organization, depending on the various functions each job category performs.