



**ADMINISTRATIVE OFFICES**  
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425.339.5210 Fax: 425.339.5216

Dear Clinic Manager:

We recognize that in complying with the HIPAA privacy rule, you must assure that all disclosures are permitted under the rule. However, please be aware that the limits on exchange of Protected Health Information (PHI) generally do not apply to governmental public health agencies. The HIPAA Privacy Rule 45 CFR 164.512(b) recognizes the legitimate need for public health authorities that are responsible for protecting the health of the public to have access to PHI to carry out their public health function.

The Privacy Rule permits covered entities to disclose PHI, without authorization, to public health authorities, such as Snohomish Health District, that are legally authorized to receive such information for the purpose of preventing or controlling disease, injury or disability. Covered entities are not required to make minimum necessary determination for public health disclosures that are made pursuant to an individual's authorization, or for disclosures required by other law 45 CFR 164.502(b). For disclosures to a public health entity, covered entities may reasonably rely on a minimum necessary determination made by the public health authority in requesting the PHI. For routine and recurring public health disclosures, such as communicable disease and other notifiable condition reports, covered entities may develop standard protocols that address the type and amount of PHI that may be disclosed for such purposes 45 CFR 164.514(d)(3)(i).

In Washington State, there are several laws and regulations that require disclosure of certain PHI to public health authorities. Chief among these are WAC 246-101 Notifiable Conditions (as authorized by RCW 43.20.050 Powers and duties of State Board of Health), RCW 70.28.010 (Health care providers required to report tuberculosis cases) and RCW 70.24 (Control and treatment of sexually transmitted diseases).

If you have any questions regarding the above, please contact:  
Nancy Blevins, RHIA, Health Records Specialist, at 425-339-5230.

Sincerely,

Gary Goldbaum, MD, MPH  
Health Officer