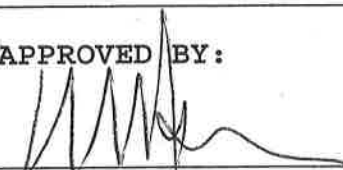


COUNTY OF IMPERIAL  
DEPARTMENT OF BEHAVIORAL HEALTH SERVICES

POLICY AND PROCEDURE MANUAL

<b>SUBJECT:</b> De-Identification of Protected Health Information	<b>PROCEDURE:</b> 01-26
<b>SECTION:</b> Administration	<b>EFFECTIVE DATE:</b> 4-14-03
<b>REFERENCE:</b> 45 C.F.R. Sections 164.502(d) & 164.514 (a)-(c)	<b>PAGE:</b> 1 of 4
<b>AUTHORITY:</b> Behavioral Health Director as the Local Mental Health Director and Alcohol and Drug Administrator	<b>SUPERSEDES:</b> New Procedure
	<b>APPROVED BY:</b> 

**PURPOSE:** To describe how protected health information (PHI) may be de-identified under the Privacy Rule of HIPAA.

**SCOPE:** The information in this document applies to all members of the workforce which includes employees, contract employees, volunteers, and trainees, etc., granted access to protected health information (PHI).

**NOTES:** Section 164.514(a) of the Health Insurance Portability and Accountability Act provides that health information that does not identify an individual and with respect to which there is no reasonable basis to believe that the information can be used to identify the individual is not individually identifiable information.

Health information that has been de-identified is not PHI and therefore not subject to the requirements for the use and disclosure of PHI in the Privacy Rule.

**DEFINITIONS:** Authorized User: an individual that is granted access to PHI for patients through an authorization, or who is performing an activity related to health care operations.

De-identified Information: De-identified information means that providers have removed, coded, or encrypted data that identifies an individual. Health information that is de-identified, i.e., does not identify the individual and with respect to which there is no

reasonable basis to believe that the information can be used to identify an individual, is not PHI and therefore not subject to the requirements for the use and disclosure of PHI in the Privacy Rule.

HIPAA: Health Insurance Portability and Accountability Act. The federal law passed in 1996 that provides national standards for health information.

Protected Health Information (PHI): Individually identifiable information relating to past, present, or future physical or mental health condition of an individual, provision of health care to an individual, or the past, present, or future payment for health care provided to an individual transmitted or maintained in any form or medium including oral, written, or electronic communication.

Workforce: Employees, volunteers, trainees, and other persons whose conduct, in the performance of work for the covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. In this procedure, the term "employee" will be used to refer to a member of the workforce.

PROCEDURE:

PERSON RESPONSIBLE

Employee

ACTION:

1. May use and disclose de-identified information in one of the two following ways:
  - A. The following identifiers of an individual or of relatives, employers, or household members of the individual, are removed:
    - 1) Names
    - 2) Geographic subdivisions smaller than a state:
      - \* street address
      - \* city
      - \* county

Employee (cont.)

- \* zip code (except if by combining all zip codes with the same initial three digits, there are more than 20,000 people)
- 3) Names of relatives and employers
- 4) All elements of dates (except year) related to an individual including:
  - a) birth date
  - b) admission date
  - c) discharge date
  - d) date of death
  - e) all ages over 89 and all elements including year indicative of such age except that such ages and elements may be aggregated into a single category of age 90 or older.
- 5) Telephone numbers
- 6) Fax numbers
- 7) Email addresses
- 8) Social Security Number (SSN)
- 9) BC number
- 10) Health beneficiary plan number
- 11) Account number
- 12) Certificate/License number

Employee (cont.)

- 13) Vehicle identifiers, including license plate numbers
- 14) Device ID and serial number
- 15) Uniform Resource Locator (URL)
- 16) Identifier Protocol (IP) addresses
- 17) Biometric identifiers
- 18) Full face photographic images and other comparable images
- 19) Any other unique identifying number characteristic, code.

B. A person with appropriate expertise in statistics and other relevant scientific principles and methods:

- 1) Determines that the risk is very small that the information could be used, alone or in combination with other reasonably available information, by the anticipated recipient to identify an individual who is the subject of the information; and,
- 2) Documents the methods and results of the analysis that justify such determination.

**Forms used in this procedure:**

None