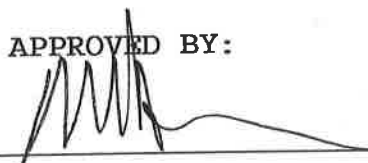


COUNTY OF IMPERIAL
DEPARTMENT OF BEHAVIORAL HEALTH SERVICES
POLICY AND PROCEDURE MANUAL

SUBJECT: Re-Identification of Protected Health Information	PROCEDURE: 01-27
SECTION: Administration	EFFECTIVE DATE: 4-14-03
REFERENCE: 45 C.F.R. Sections 164.502(d) & 164.514 (a)-(c)	PAGE: 1 of 2
AUTHORITY: Behavioral Health Director as the Local Mental Health Director and Alcohol and Drug Administrator	SUPERSEDES: New Procedure
	APPROVED BY: 

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

SCOPE: The information in this document applies to all members of the workforce which includes all 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.

Section 164.514(c) of the HIPAA Privacy Rule addresses re-identification. De-identified information that has been re-identified is PHI and ICBHS may use or disclose such re-identified information only as permitted for PHI under the HIPAA Privacy Rule.

DEFINITIONS: 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 HIPAA Privacy Rule.

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

ICBHS Employee

ACTION:

1. Assigns a code or other means of record identification to allow information de-identified to be re-identified provided that:
 - A. The code or other means of record identification is not derived from or related to information about the individual is not otherwise capable of being translated so as to identify the individual; and,
 - B. The code or other means of identification is not used or disclosed for any other purpose and does not disclose the mechanism for re-identification.

Forms used in this procedure:

None