NORTHERN NEVADA ADULT MENTAL HEALTH SERVICES

POLICY AND PROCEDURE

SUBJECT: DE-IDENTIFICATION OF PROTECTED HEALTH INFORMATION

NUMBER: NN-IM-PS-09 

ORIGINAL DATE: 05/29/03

REVIEW/REVISE DATE: 05/04/06, 3/19/09, 3/15/12

APPROVAL, Cody L. Phinney, MPH, Agency Director

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I. PURPOSE

To develop guidelines for de-identifying Protected Health Information (PHI).

II. POLICY

Northern Nevada Adult Mental Health Services (NNAMHS) will use de-identified PHI if the anticipated recipient of the information will not need to identify an individual in order to accommodate the purpose for receipt of the health information.

III. REFERENCES

1. HIPAA 164.502, 164.514

IV. DEFINITIONS

1. De-identified information – PHI that does not identify an individual and there is no reasonable basis to believe that the information can be used to identify the individual [Ref: Part 164 Subpart E 164.514]
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2. Re-identified information – A method devised to identify an individual who's PHI has been de-identified.

V. PROCEDURE

1. Health Information Services (HIS) will be responsible for de-identifying medical records.
2. De-identified health information will be used for:
   a. research
   b. analysis
   c. aggregate data trending
   d. papers by students, interns, residents
   e. other purposes as approved by the Agency Director
3. De-identification will be used for electronic, paper or any other form of PHI as determined appropriate.
4. De-identified information/data are exempt from HIPAA regulations and can be used in ways that the HIPAA regulations might not otherwise allow.
5. Information is considered de-identified:
   a. If, after de-identification, the risk is very small that the information could be used alone or in combination with other reasonably available information, to identify an individual; and
   b. The following identifiers of the individual, relatives, employees, or household members are removed:
      1) Names
      2) All geographic subdivisions smaller than a state, including street address, city, county, precinct, except for the initial three digits of a zip code **if** according to census data
      3) The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and

c) The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people are changed to 000.

1) All elements of dates (except year) directly related to an individual (e.g., birth date, admission date, discharge date, date of death, individual ages over 89, which may be aggregated into a single category of age 90 or older.
2) Telephone numbers
3) Fax numbers
4) Electronic mail addresses
5) Social security numbers
6) Medical record numbers
7) Health plan beneficiary numbers
8) Account numbers
9) Certificate/license numbers
10) Vehicle identifiers and serial numbers
11) Device identifiers and serial numbers
12) Uniform resource locators (URL's) on World Wide Web
13) Internet protocol address numbers
14) Biometric identifiers, including finger and voiceprints
15) Full face photographic images and comparable images; and
16) Any other unique identifying number, characteristic or code

6. Re-identification

   a. The HIS Department (paper records) and/or the Program Evaluation Department (electronic data) will, as necessary, assign a code to allow de-identified information to be re-identified.

      1) The code will not be derived from or related to information about the individual, and cannot otherwise be translated so as to identify the individual; and

      2) The assigned code will not be disclosed for any other purpose, and the mechanism for re-identification will not be disclosed.

7. De-identified/re-identified records/data will be logged by HIS on the Record of De-identified/re-identified Health Information form.