



# PLUMAS COUNTY, CALIFORNIA

## HIPAA RELATED POLICY AND PROCEDURES

EFFECTIVE APRIL 14, 2003

### DE-IDENTIFYING PROTECTED HEALTH INFORMATION

**Policy:**

Plumas County may de-identify an individual's protected health information.

**Purpose:**

Covered entities may use protected health information to create information that is not individually identifiable; the requirements of the HIPAA Privacy Rule do not apply to this de-identified information.

**Responsibilities:**

Use and disclosure of de-identified information must NOT include disclosure of a code or other method designed to enable the information to be re-identified.

Plumas County must use one of the following methods to de-identify information:

1. A person with appropriate knowledge and experience to apply generally accepted statistical and scientific principles and methods for rendering information not individually identifiable and certify that the information could not be used by anticipated recipients to identify a subject of the information. The method and results of the analysis must be documented.
2. Remove all of a list of enumerated identifiers of the individual or of relatives, employers, or household members of the individual. This is referred to as the safe harbor method of de-identification.
3. The use of limited data sets. This limited data set would exclude obvious identifiers such as name, address, phone number, social security number, URLs, etc. but would allow additional data related to dates of care, age, city, state, zip code. Limited data sets may only be used if Plumas County enters into a data use agreement with the limited data set recipient.

Limited data set agreements must:

- Establish the permitted uses and disclosures of such information by the recipient;
- Establish who is permitted to use or receive the limited data set; and
- Provide that the recipient will:

1. Not use or disclose the information other than permitted by the data use agreement or required by law;
2. Use appropriate safeguards to prevent use or disclosure of the information other than as provided for by the data use agreement;
3. Report any use or disclosure not provided for by the data use agreement to Plumas County;
4. Ensure that any agents to whom it provides the limited data set agree to the same restrictions and conditions that apply to the limited data set recipient; and
5. Not identify the information or contact the individuals.

**Process:**

If using the safe harbor method of de-identification, the following information **MUST** be removed:

- Names
- All geographic subdivisions smaller than a state
- All elements of dates directly related to the individual including birth date, admission date, discharge date, date of death, all ages over 89, etc.
- Telephone numbers, fax numbers, email addresses
- Social security numbers, medical record numbers, health plan beneficiary numbers, account numbers, certificate and license numbers
- Vehicle identifiers including license plate numbers and serial numbers
- Device identifiers and serial numbers
- Web URL's and internet protocol address numbers
- Biometric identifiers including fingerprints and voice prints
- Full face photographic images and any comparable images
- Any other unique identifying number, characteristic or code

Limited data sets are not fully de-identified. In a limited data set used for the purpose of research, public health or health care operations **ALL** of the above information must be removed **EXCEPT** dates and geographic location. Dates of birth, death, admission and discharge may be included as well as locations including zip code, town, city, and state.

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Reference: 45 CFR 164.502 and 164.514