



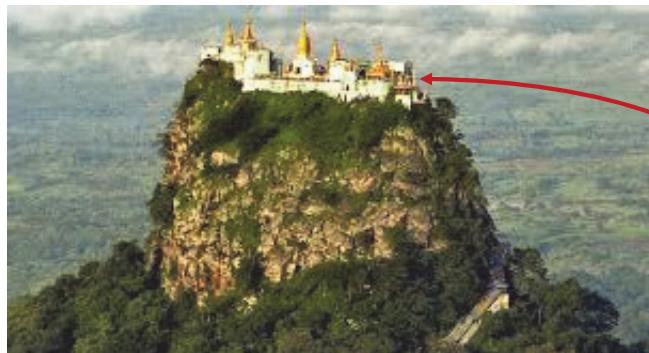
# “Real-world” de-identification of transactional data extracted from electronic health records – breaking the curse of dimensionality

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## Streamlined, Privacy-Protected Access to Data – the Ultimate Quest and Grand Challenge

A body of person-level, real-world transactional (and other) health data, extracted from a jurisdictionally-heterogeneous array of clinical information systems, ***pre-authorized*** by multiple stewards for disclosure –under a well-specified set of conditions)



# My kingdom for ***consensus*** on a data de-identification methodology that scales out to real-world high-dimensional health datasets

- The access streamlining challenge - ***pre-authorized*** by a ***distributed array*** of data stewards – engage with stewards once, re-use the linked data many times.
- A Thorny Problem - when data linkage, ***de-identification*** and access are centrally administered, how can this distributed array of source-data stewards know the privacy risk profile of the ***linked data***? If they don't know this – how can they sign off on a disclosure – assuming that "risk" and "legislative/regulatory compliance" has something to do with "data contents". Might this slow down approval processes???
- Required –an explicitly articulated data disclosure privacy risk model, clear ***operational*** definitions of key constructs such as "***identifiable***" or "***anonymized***" or "***limiting disclosure***" – or "***risk***" – and a set of standard operating procedures keyed to that model.
- No model = no shared understanding or consensus at the level of SOPs.
- With these SOPs recapitulated at every point and level within the data ecology (a 'fractal' data access management architecture) we can implement distributed and ***proportionate data de-identification*** procedures.
- With proportionate data de-identification in place, we can then implement collective ***proportionate governance*** –calibrating level of oversight, review and data protection to risk.
- One more thing – the model needs to scale out to access to supercomputer/cloud environments. And it must also scale out to cross-border data access.<sup>3</sup>

## A very challenging but very real-world problem/ real-world data disclosure scenario

**Clinical Problem/Overarching Research Question** –all causes of excess morbidity/mortality in the ***full spectrum*** of substance users/misusers – what are they, and how do people with these causes interact over time with the health service system?

### Data Requirements:

- Basic Demographics – age in years, gender;
- Cross-continuum transactions consisting of encounters plus dates (in a way that preserves sequence and duration) within 1700 programs over 10 years (3,650 days)
- Acute care diagnoses, procedures (14,000 ICD9 categories);
- Emergency Department (ED) presenting complaints (165 values); ED Clinical Discharge Diagnoses;
- Minimum Reporting Requirements (Ministry of Health) for Mental Health & Substance Use: 346 clinically relevant variables, ≥ 1 record per MHSU program registration;
- Pharmacy data including community pharmacy data (i.e., potentially thousands of different medications);
- Cost centre data;
- Vital Stats (deaths).

**Sample Size:** 4,000,000 encounters, on a cohort of 170,000 persons – not "big data" but definitely ***very high dimensional*** (relative to any imaginable sample size)

Researchers located in BC and in the United States.

# Victoria/Ottawa/Brussels –and “data subjects” –we may have a data access management problem.

- Worst case: *roughly* 23,438 case-distinguishing features in the Scenario dataset. We'll call them “dimensions”.  
*0.0000000000000000000000761* ↗
- From the vantage point of “cell size”, that would be *roughly/theoretically* 7.61E-20 people per cell (on average) generated by those dimensions.
- If “high dimensional” means “more cells than people” then this is VERY high dimensional ‘space’ – cases are VERY FAR APART (sparsely distributed).
- If they are sparsely distributed, they are *distinguishable* (not in the same place) – they can be *singled out* – and this is a mission-critical enabler for re-identification.
- The cases are distinguishable, but not “lost in space” – *they can be linked to people* here in the world by “*seemingly innocuous*” variables (e.g., DOB plus Postal Code) – or maybe by combinations of high-visibility/low prevalence health conditions.....
- HOWEVER, most of the 7.61E-20 cells are empty, and much of the content in that space is not “knowable” (in a personally identified way) by ordinary human beings relying on “*reasonably likely*” means.
- So we may have a problem! But if the real problem is less than 7.61 E-20 average cell size, how bad is it? And what should we **do** about the real human-scaled problem – back on earth.?
- For different people to ask this question and **get the same answer:** we need a method.  
5

Our method must be able to adjudicate among a variety of options

1. No de-identification – disclose with unique identifiers
2. Nominal de-identification – remove “obvious” identifiers.
3. *Ad hoc* rule-of-thumb approaches plus #2, e.g., coarsen Postal Codes and Dates of Birth.
4. Documented & validated heuristic approaches (e.g., Safe Harbor 18 categories of re-identification “risk carriers”)
5. Statistical disclosure control (SDC)-based methods – e.g., k-anonymization.
6. Data simulation approaches (?? how far can these go??).
7. No disclosure, even if judged to be in the public good.

For related work (with details) see: El Emam, K. & Hassan, W. (2013) The De-identification Maturity Model. Privacy Analytics, Inc.

<http://waelhassan.com/wp-content/uploads/2013/06/DMM-Khaled-El-Emam-Wael-Hassan.pdf>

## How about Option #2? We'll just jettison the primary care data, invoke provisions that allow disclosures of personal information for research purposes, and get on with it.

**35** (1)A public body may disclose personal information in its custody or under its control for a research purpose, including statistical research [subject to a specified set of conditions that include approval from the head of the public body...] (from BC Freedom of Information and Protection of Privacy Act, current as of Jan 2, 2019).

- **Question:** Why don't we just invoke 35(1) and implement robust technical controls?
- **Answer #1:** General limiting principles in privacy laws/codes; "unreasonable invasion of privacy"; recognition of "mosaic effect" associated with "seemingly innocuous" bits of [linkable] information:  
*In the US HIPAA Privacy Rule, there is a similar "minimal necessary" requirement. Therefore, as a starting point, the application of such limiting principles or minimal necessary criteria requires that de-identification be considered for all collection, use, and disclosure of health information.* (El Emam, Jonker, & Fineberg. The Case for De-Identifying Personal Health Information (January 18, 2011).
- **Answer #2:** Legislative compliance is not the same as due diligence.
- **Answer #3:** Free floating generalized data disclosure anxiety states (or traits) – GDDAS – not in ICD9/10 or DSM-V)

NOTE: GDDAS is often secondary to absence of organizational standard operating procedures **and documentation of methods and justification of those methods** for meeting "limiting disclosure" requirements (see e.g. CFR164.514 or GDPR re: requirements around documenting procedures).

7

## How about Option #5 – we'll just de-identify using classic k-anonymization

- k-anonymization – the industry-standard, most basic tool for implementing the US Privacy Rule [statistical] expert determination method for data de-identification – for "limiting disclosure" in a methodologically transparent fashion that translates across data disclosure scenarios.
- It works by rendering cases INDISTINGUISHABLE on the basis of any information available in the world that could be used for re-identification purposes – compress dimensions in space so that distinguished cases are re-located to essentially exactly the SAME place in data space.
- Sounds great. What's the problem?

*Cavoukian and Castro concede that de-identification is inadequate for high dimensional data. But nowadays most interesting datasets are high-dimensional. High-dimensional data consists of numerous data points about each individual, enough that every individual's record is likely to be unique, and not even similar to other records. Cavoukian and Castro admit that: "In the case of high-dimensional data, additional arrangements may need to be pursued, such as making the data available to researchers only under tightly restricted legal agreements." Of course, restrictive legal agreements are not a form of de-identification. Rather, they are a necessary protection in cases where de-identification is unavailable or is likely to fail.*

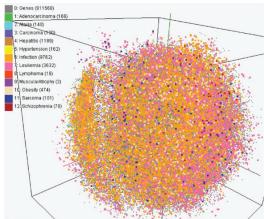
# You can't get there from here – how high dimensionality breaks k-anonymization

Everybody distinguishable  
– in practically uncountably  
many different ways

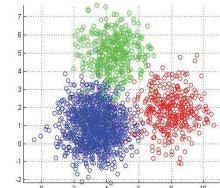
Inherently  
Problematic

Not so  
Problematic

People starting to “clump”  
together into groups where  
members are similar – and  
more privacy-protected.



The more similar people are in a dataset, the more difficult it is to re-identify anybody with any “reasonable” degree of confidence.  
You want to be able to get from this state to that state, while preserving the fitness of the data.

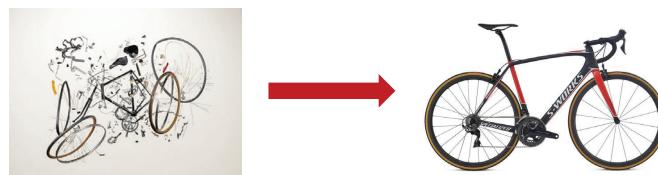


So sorry! Distinguishability is another name for “distance”. k-anonymization measures distance in the quintessentially most simple way – exact correspondence on one or more risk-carrying attributes. But being able to measure distance (i.e., similarity vs difference) between people is one of the most basic curse(s) of High Dimensional Data – and essentially everybody in a high dimensional dataset is likely to be as different as their fingerprints.

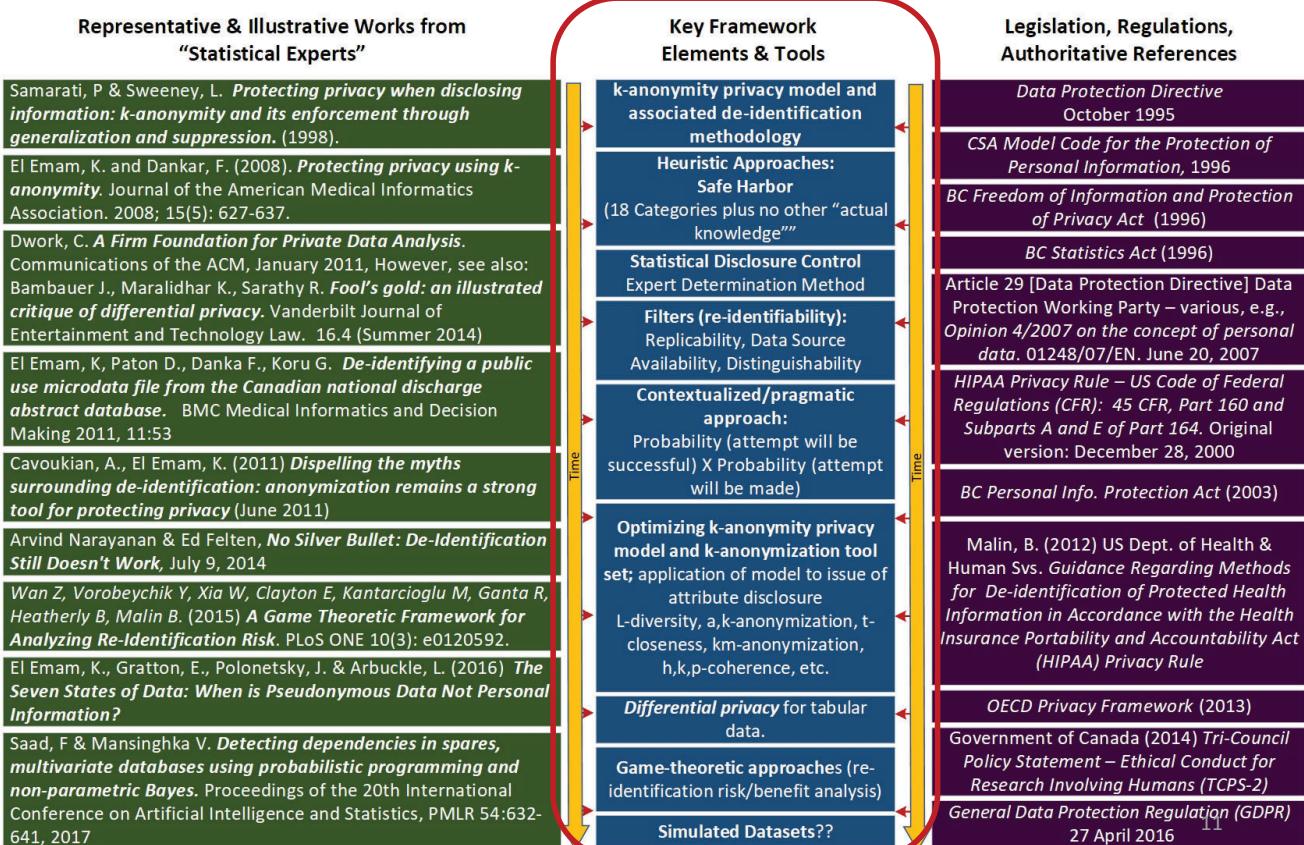
You can inject statistic noise into the dataset. That does nothing about distinguishability, but it does obscure the relationship between the data and reality - that detracts from the fitness of the data. And, the amount of noise you have to inject increases multiplicatively as you add dimensions. So this is not a solution, at least not for research with a real-world applied focus.

## Meta-k-anonymization

- Risk is related to how distinguishable people are in a dataset.
- Distinguishability is related to how “far apart” people are in the data ‘space’ created by the variables in the dataset
- Unfortunately, you cannot even meaningfully measure “distance” in these high dimensional spaces, particularly when the bits and pieces in this space are very different (e.g., one acute care admission of 178 days is not the same as one visit to the cast clinic?)
- You have only one option: find some **reasonably** defensible way of dramatically reducing dimensionality and marking off vast portions of this space as “irrelevant” to the disclosure at hand.
- **Then** measure risk – within the context of a method that also factors in context, and supplies tools for at least coarsely operationalizing elusive constructs such as “reasonably likely” means for re-identifying data.
- Use this same method to supply a reference standard for key constructs such as “limiting disclosure” or “low risk”.
- Can we assemble that method out of “off-the-shelf” components?

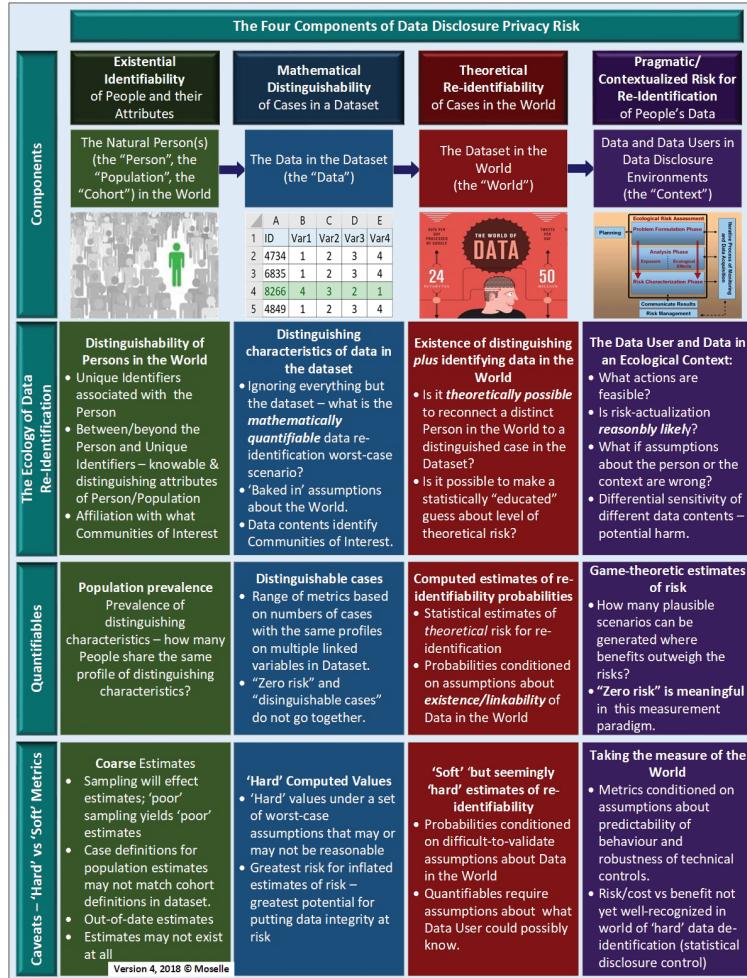


# Yes - nothing new under the sun – assembling the framework from existing components



A model assembled from those  
(and a few other) features

## Data De-Identification – In Four Movements



13

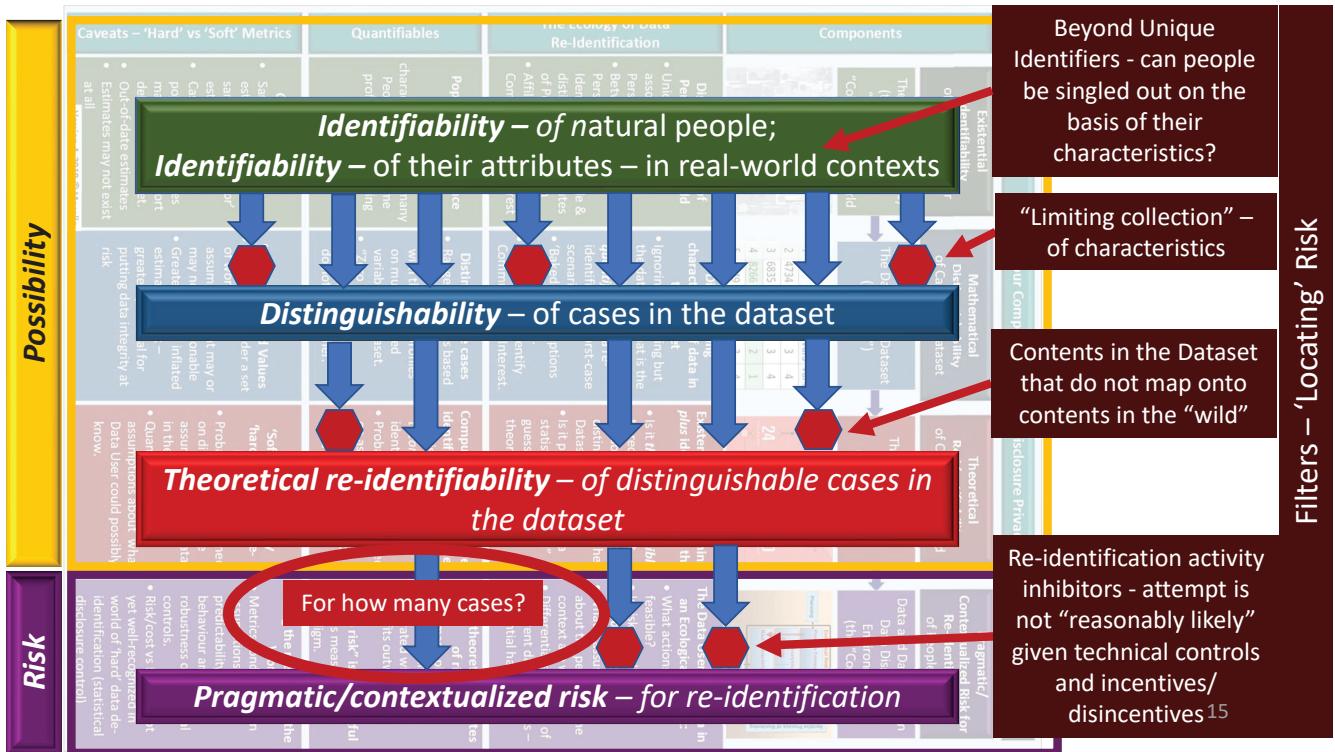
## Four components that collectively specify the risk profile of a candidate data disclosure

- **Component #1 - People in the world** – with attributes that need to be preserved (e.g., response to treatment) in the data as disclosed, while preserving the privacy of the people associated with those attributes.
- **Component #2 – Mathematical distinguishability of cases** in the Dataset – without which there is no privacy risk associated with the disclosure – the data "space".
- **Component #3 – Dataset in "data space" meets data in the "real-world"** – from "distinguishability" to "theoretical re-identifiability".
- **Component #4 – Logistical/pragmatic features of the disclosure** – how feasible and likely is it that someone will perform the actions required to transform theoretically re-identifiable contents into re-identified contents?

14

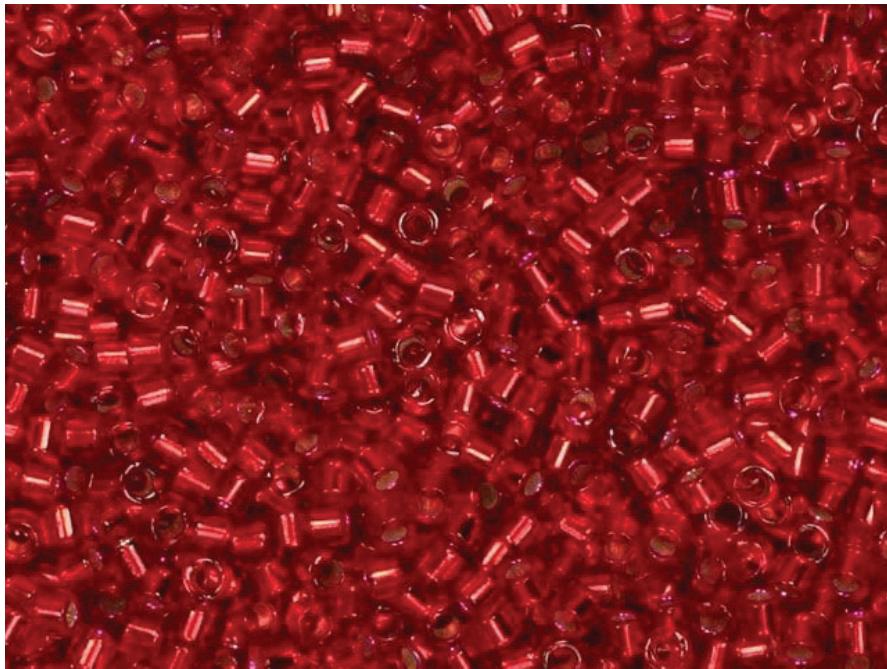
The basic logic of the model and method:

- contextualized [lowest-reasonable] assessment of re-identifiability;
- dimensional reduction based on multiple methods, including ‘hard’ (statistical) and ‘soft’ (contextual) assessment;
- de-identify data based on this complete contextual assessment.



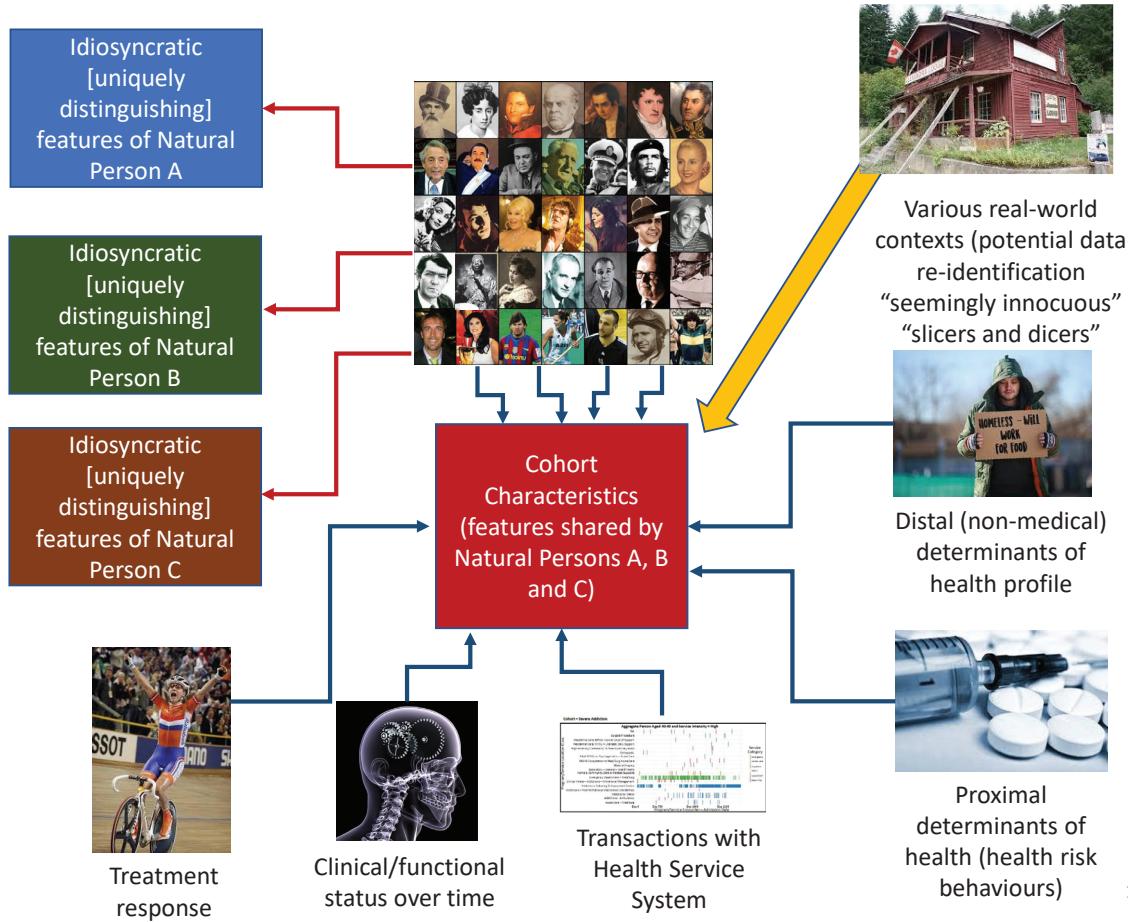
# Unpacking the model

## A bunch of indistinguishable things (no risk for re-identification without a microscope)



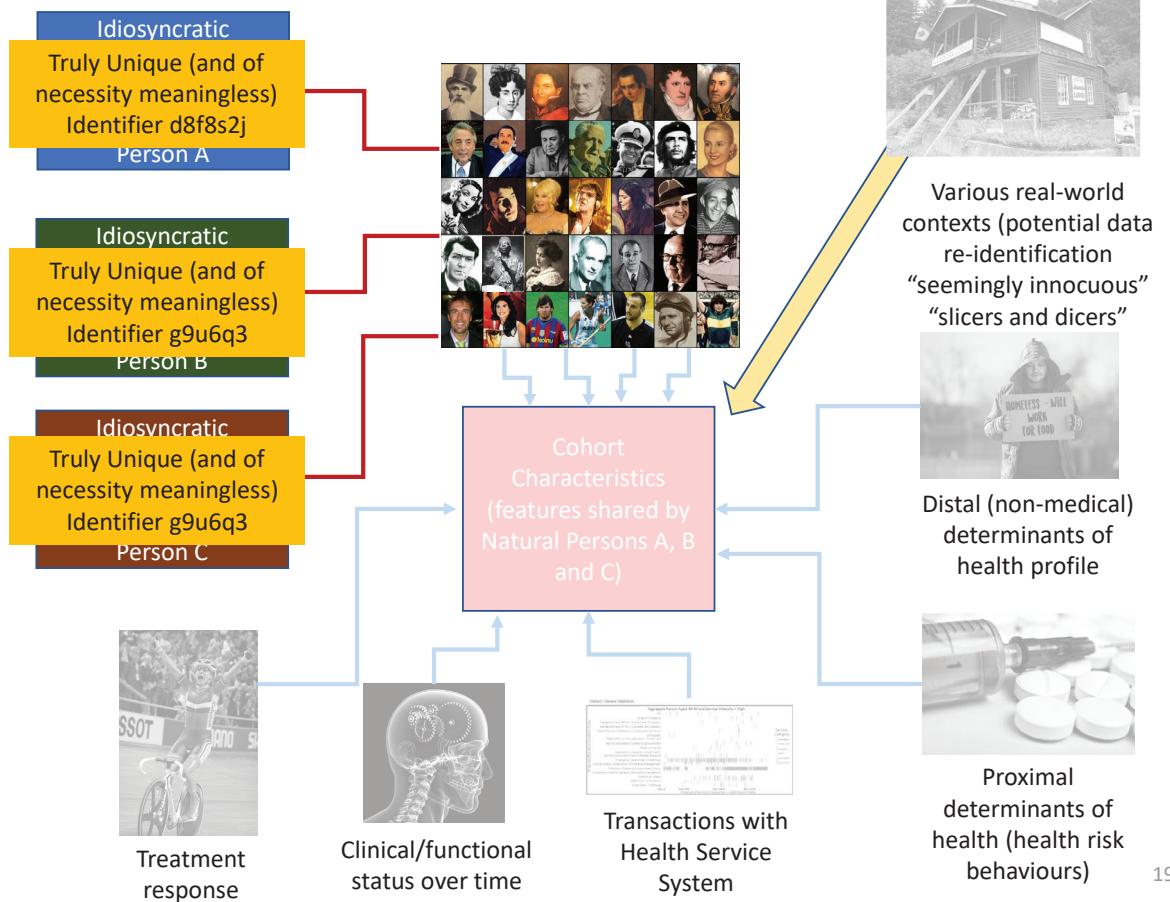
17

### People in the World – Possessing Attributes



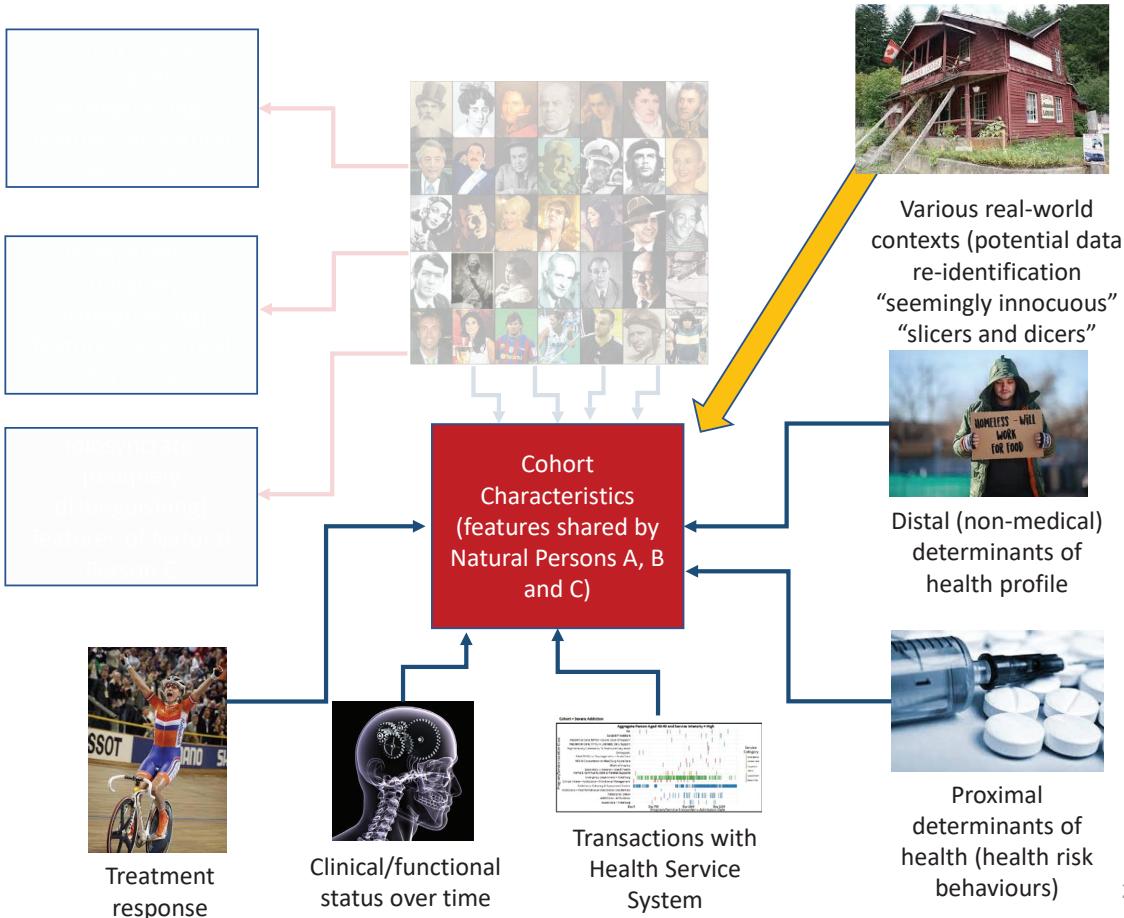
18

## Idiosyncratic Features – We can mask these in the dataset.



19

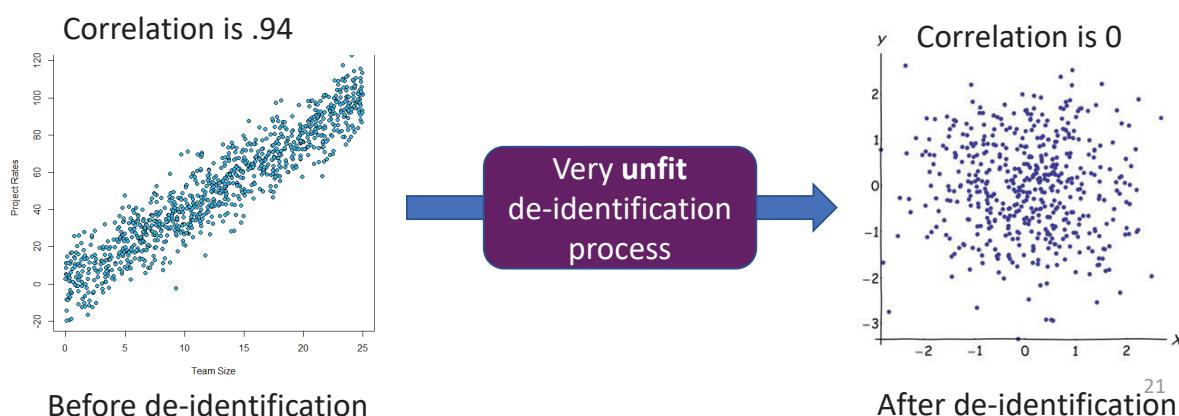
Cohort Characteristics-of-Analytical Interest. We need to preserve these.



20

# Dataset Fitness – Preserving Analytical Integrity of De-Identified Data

- Fit for analysis
- Fit for purpose-of-use (of analytical products)
- Fit as in ‘physically’ fit - capable of yielding findings that are as statistically robust or “buff” as the same findings that would be obtained if the data were analyzed in their pristine form.
- But what we do NOT want is “fit for re-identification”



## The challenge

- The data in the clinical information system has all of these different types of information all linked to the patient/client identifier.
- We need to mask/suppress/delete the information that only functions to identify the patient/client.
- We need to keep ALL of the information that relates to the cause-effect relationships of interest.
- But SOME of that information may be distinguishing, and may therefore carry re-identification risk, even if some of that “risky” information is NOT “seemingly innocuous” – i.e., analytical integrity of the data depends on retaining that information.
- Sometimes “fit-for-analysis” or “fit-for-purpose” also translates into “fit for successful re-identification attempt”.

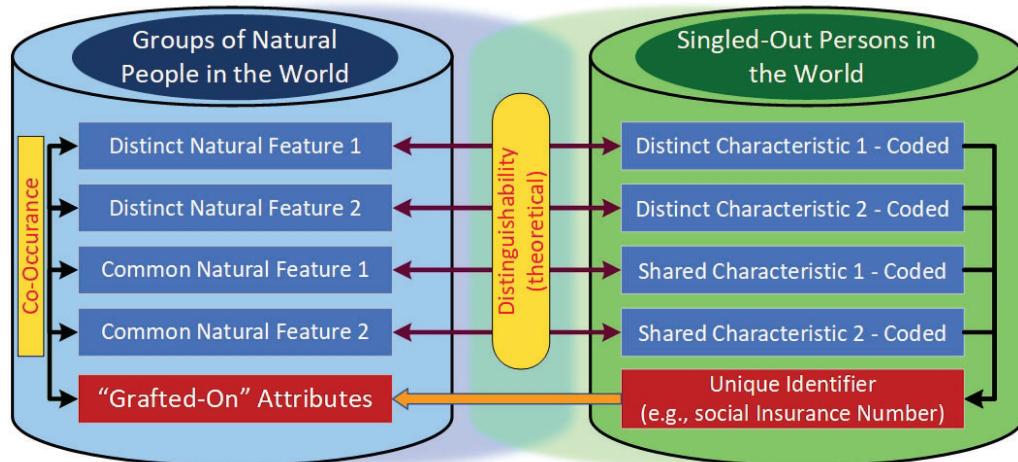
At the point that we disclose the data to the researcher or QA/QI analyst – we want people in the dataset to look *sort of* the same – but not really – and the “not really” should be the features of analytical interest and the location of the analytical “public good”.



23

## Component #1 – Identifiability of people and their attributes

Component	Ecology of Data Re-Identification	Quantifiables	Caveats – ‘Hard’ vs ‘Soft’ Metrics
The Natural Person(s) •The “Person” •The Cohort(s) to which the person belongs •The Population from which the Cohort(s) are drawn	Distinguishability of Persons in the World <ul style="list-style-type: none"> <li>Unique Identifiers associated with the Person</li> <li>Between/beyond the Person and Unique Identifiers – knowable &amp; distinguishing attributes of Person/Population</li> <li>Affiliation with what Communities of Interest</li> </ul>	Population Prevalence Prevalence of distinguishing characteristics – how many People share the same profile of distinguishing characteristics?	Coarse Estimates <ul style="list-style-type: none"> <li>Sampling effects estimates</li> <li>Case definitions for population estimates may not match cohort definitions in dataset.</li> <li>Out-of-date estimates</li> <li>Estimates may not exist at all</li> </ul>



24

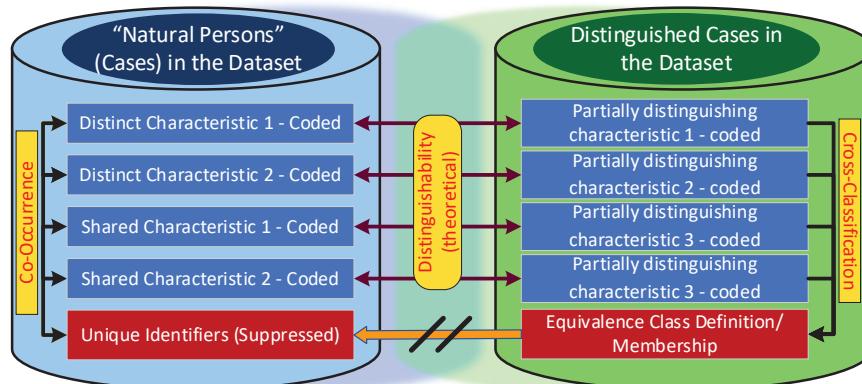
# What emerges out of this first component – Natural People in the World?

- Estimates of prevalence of attributes within a cluster of people (e.g. a population or cohort).
- Statistical properties of distinct attributes and relationships (ideally cause-effect relationships) between attributes – these must be preserved in the data post de-identification.
- Differential sensitivity of different data contents (e.g., ICD9 303.01 “Acute alcoholic intoxication in alcoholism, continuous” vs 845.00 “Sprain of ankle”)
- Real-world contextual factors (e.g. lives in small community) and other factors (e.g. visibly young or old) that contribute to re-identification risks.
- We can think of these contextual factors as re-identification “slicers and dicers”.
  - Sometimes referred to as “seemingly innocuous” pieces of information that contribute to the “mosaic” effect.
  - They can “partition” definitely not-innocuous bodies of information (potential privacy invaders) in such a way that re-identification risk is increased – possibly substantially.

25

## Component #2 – Distinguishability of cases in the dataset

Component	Ecology of Data Re-Identification	Quantifiables	Caveats – ‘Hard’ vs ‘Soft’ Metrics
<b>The Dataset (the “Data”)</b> If a dataset has meaningful and useful content, it must reflect distinguishing characteristics of persons in the World.	<b>Distinguishing characteristics of data in the Dataset</b> <ul style="list-style-type: none"> <li>• Ignoring everything but the dataset – what is the mathematically quantifiable data re-identification worst-case scenario?</li> <li>• ‘Distinguishability’ of cases reflects strong assumptions about data in the World</li> <li>• Data contents identify Communities of Interest.</li> </ul>	Distinguishable Cases <ul style="list-style-type: none"> <li>• Range of metrics - based on numbers of cases with the same profiles on multiple linked variables in Dataset.</li> <li>• “Zero risk” = no information content; “meaningful content = distinguishable cases”; therefore <b>“zero risk” for a dataset with meaningful content makes no sense.</b></li> </ul>	<b>“Hard” Computed Values</b> <ul style="list-style-type: none"> <li>• ‘Hard’ values under a set of worst-case assumptions that may or may not be reasonable</li> <li>• Greatest risk for inflated estimates of risk – greatest potential for putting data integrity at risk</li> </ul>



26

# What emerges out of this second component

## – Distinguishability of Cases in the Dataset

- Computed estimates of number of cases that could (in theory) be re-identified – with quantitative estimate estimates of the certainty of re-identification.
- Measures of distinguishability provide MAXIMUM estimates of number or proportion of cases that could be re-identified at different levels of certainty – on the basis of worst-case assumptions that are almost invariably going to be counterfactual.
- Beware of arguments based on counterfactual premises\*, e.g., “if wishes were horses then beggars would ride” or the “myth of the perfect population register”\*\* or the “omniscient data adversary” assumption:

*...when considering link disclosure attackers, one has to define what external resources are available to them. As it happens in cryptography, the most recommendable option (in order to ensure privacy even in the **worst case**) is to assume that the attacker has obtained some information on **all original records** in T, and then he uses this information in order to infer links between protected records in T' and original records in T. [emphasis added]\*\*\**

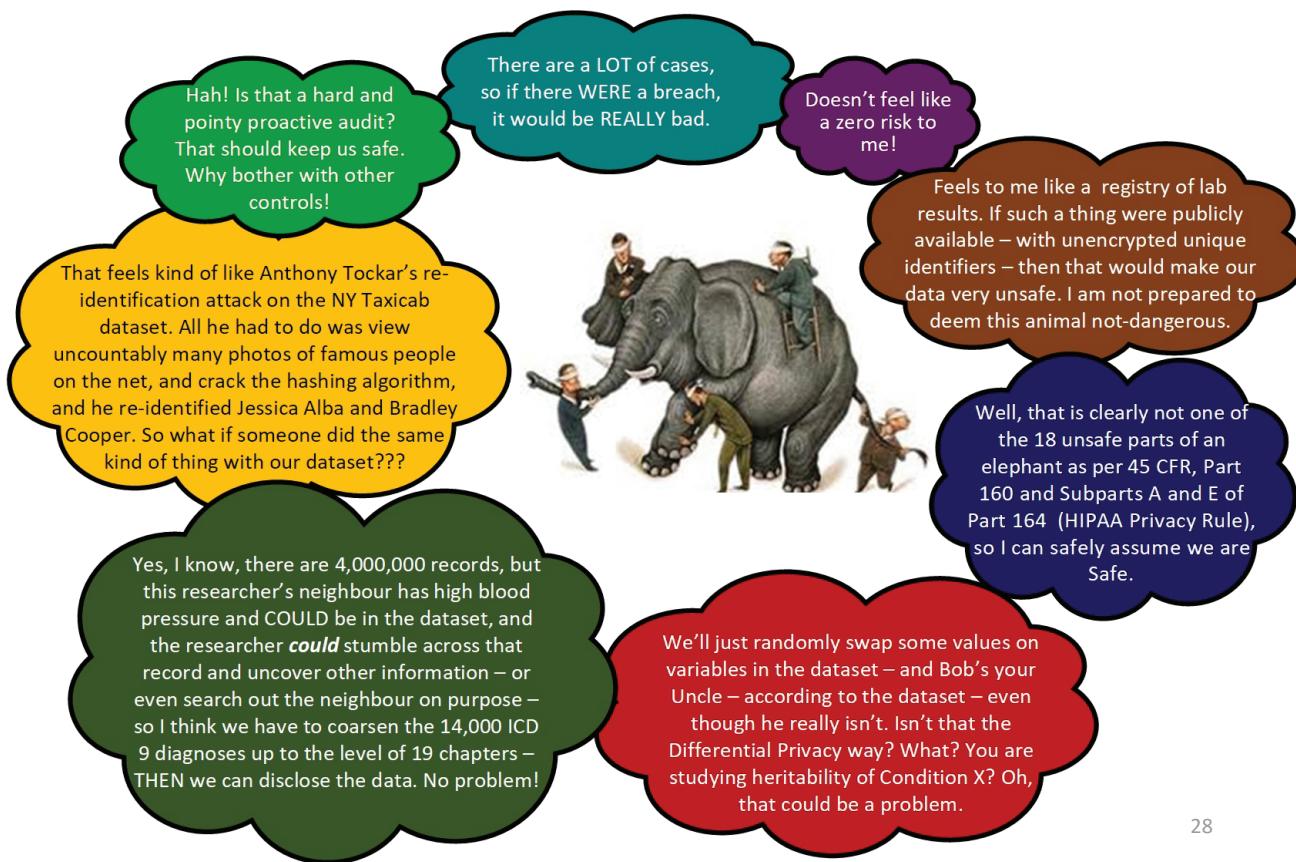


\*Goodman, N. The problem of counterfactual conditionals. *The Journal of Philosophy*, vol 44, No 5, February 1947, pp. 113-128.

\*\*Barth-Jones, D. The "Re-identification" of Governor William Weld's Medical Information: A Critical Re-examination of Health Data Identification Risks and Privacy Protections, Then and Now. Pre-publication draft – working paper, June 18, 2012.

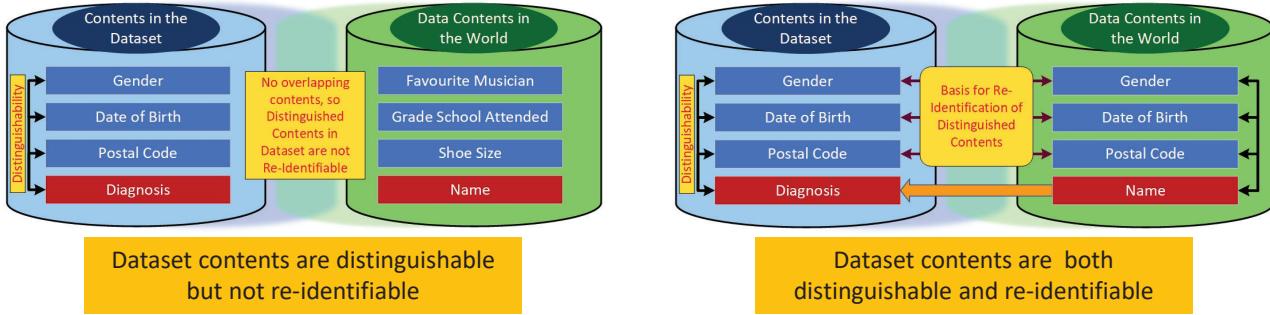
\*\*\*J Herranz, J Nin, P Rodriguez & T Tassa. Revisiting distance-based record linkage for privacy-preserving release of statistical datasets. *Data & Knowledge Engineering* 100 (2015) 78-93

## Conflating Distinguishability and Risk: Appealing Mathematical Precision, but Blind to Context



# Component #3 – *Re-identifiability* of Cases

Component	Ecology of Data Re-Identification	Quantifiables	Caveats – ‘Hard’ vs ‘Soft’ Metrics
<b>The World of Data</b> Do data contents that distinguish cases in the nominally de-identified Dataset also exist in the world – together with identifiers for the distinguished cases?	<p><b>Existence of distinguishing plus identifying data in the World</b></p> <ul style="list-style-type: none"> <li>Is it <b>theoretically possible</b> to reconnect a distinct Person in the World to a distinguished case in the Dataset?</li> <li>Is it possible to make a statistically “educated” and quantifiable guess about the level of theoretical risk – for distinguished cases or for distinguished groups of cases in the dataset?</li> </ul>	<p><b>Computed estimates of re-identifiability probabilities</b></p> <ul style="list-style-type: none"> <li>Statistical estimates of theoretical risk for re-identification</li> <li>Probabilities conditioned on assumptions about <b>existence/linkability of Data in the World</b></li> </ul>	<p>“Soft” but seemingly ‘hard’ estimates of re-identifiability</p> <ul style="list-style-type: none"> <li>Probabilities conditioned on difficult-to-validate assumptions about Data in the World</li> <li>Quantifiables require assumptions about what Data User could possibly know.</li> </ul>



*In general terms, a natural person can be considered as “identified” when, within a group of persons, he or she is “distinguished” from all other members of the group. Accordingly, the natural person is “identifiable” when, although the person has not been identified yet, **it is possible to do it (that is the meaning of the suffix “-able”)** [emphasis added].*

Article 29 Data Protection Working Party, Opinion 4/2007 *On the concept of personal data*. 01248/07/EN. June 20, 2007

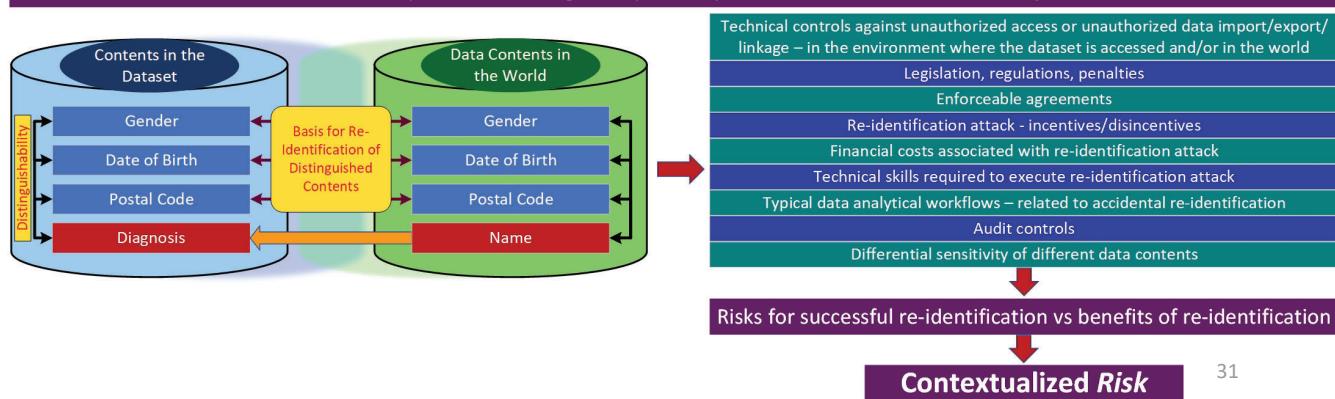
## Component #3 – Dataset meets the real world

- Estimates of Distinguishability qualified by evaluation of contents in the “real world”.
- We are trying to operationalize the construct in the literature known as “adversary power”.
- We can do this quantitatively – and generate numbers that appear to be “hard”
- However – “hard” (estimates of Distinguishability) divided by “soft” (estimates of adversary power expressed numerically) may be quantitative- and appear precise- but they are not – since they may vary widely based on assumptions.
- Re-identifiability (of data) and “power” of “adversaries” are necessary conditions for the **possibility** of re-identification – they are only partially contextualized measures of risk.

# Component #4 – Pragmatic/Contextualized *Risk* for Re-Identification

Component	Ecology of Data Re-Identification	Quantifiables	Caveats – ‘Hard’ vs ‘Soft’ Metrics
<b>Data &amp; Data Users in Data Disclosure Environments (the Context)</b> <ul style="list-style-type: none"> <li>Is it logically feasible for re-identifiable data contents to be re-identified by parties with authorized access to the data.</li> <li>What are potential costs and benefits to a data user who attempts to re-identify the data?</li> </ul>	<b>The Data User and Data in an Ecological Context</b> <ul style="list-style-type: none"> <li>What actions are feasible?</li> <li>Is risk-actualization reasonably likely?</li> <li>What if assumptions about the person or the context are wrong?</li> <li>Differential sensitivity of different data contents – potential harm.</li> </ul>	<b>Game-theoretic estimates of risk</b> <ul style="list-style-type: none"> <li>How many plausible scenarios can be generated where benefits outweigh the risks?</li> <li>“Zero risk” is meaningful in this measurement paradigm.</li> </ul>	<b>Taking the Measure of the World</b> <ul style="list-style-type: none"> <li>Metrics conditioned on assumptions about predictability of behaviour and robustness of technical controls.</li> <li>Risk/cost vs benefit not yet well-recognized in world of ‘hard’ data de-identification (statistical disclosure control)</li> </ul>

From “Theoretically Possible and Logistically Not-Impossible” to “Real-World/Real-People Risk”



31

## Component #4 - Being “reasonable”

*The principles of data protection should apply to any information concerning an identified or identifiable natural person. Personal data which have undergone pseudonymisation, which could be attributed to a natural person by the use of additional information should be considered to be information on an identifiable natural person. To determine whether a natural person is identifiable, account should be taken of all the means reasonably likely to be used .....The principles of data protection should therefore not apply to anonymous information, namely information which does not relate to an identified or identifiable natural person....[GDPR - General Data Protection Regulation, 27 April 2016]*

*“anonymization” is a de-identification process that removes or transforms all direct and indirect identifiers in a record for which there is a reasonable expectation that the identifiers could be used, either alone or with other information, to identify an individual - An anonymized record no longer contains personal information; therefore, the privacy protection provisions contained in Part 3 of the Freedom of Information and Protection of Privacy Act or other applicable legislation no longer apply. [BC Ministry of Health – Policy – Access to Health Data for Research, September 1, 2018]*

***It is important to be realistic and consider plausible attacks***, especially when there are data use agreements that prohibit re-identification, linking to other data, and sharing without permission. Besides the standards which give direction on the selection of identifiers and precedents for acceptable levels of risk, an evaluation or re-identification risk can be limited to the amount of information that an adversary can realistically know (the “attacker’s power”). [S. Garfinkel, *De-Identification of Personal Information*, National Institute of Standards & Technology, U.S. Dept. of Commerce, October 2015]

Whatever this “being reasonable” thing is – **it is powerful enough to render data “anonymized”** and free of legislated/regulatory constraints associated with “identifiable” information – as per GDPR, Article 29 Data Protection Working Party (EU), BC Ministry of Health, Office of the Information Commissioner Queensland, others.

32

# What do we get from Component #4

- What technical challenges would need to be addressed to access data in the world required to re-identify data in the dataset? What would it cost? How much technology and technical skills would be involved?
- What incentives/disincentives are at place?
- A “reasonable” method for calibrating assumptions about data availability in the world.
- A “reasonable” method for operationalizing key constructs about people, such as “adversary power”, or “risk for doing X, Y or Z”.
- An important change in measurement focus: from various measures related to proportion of cases that are distinguishable (k-anonymization or related metrics) to **game-theoretic measures based on all possible combinations of risks and benefits associated with re-identification attempts.**
- If there are no reasonably envisioned scenarios where benefits outweighs risks or costs, then from a game-theoretic vantage point – there is **zero risk!**\*

\*Wan, Zhiyu; Vorobeychik, Yevgeniy; Xia, Weiyi; Clayton E. Katarcioglu M and Malin B. Expanding Access to Large-Scale Genomic Data While Promoting Privacy: A Game Theoretic Approach The American Journal of Human Genetics, 02/2017, Volume 100, Issue 2  
Published online 2017 Jan 5. doi: [10.1016/j.ajhg.2016.12.002](https://doi.org/10.1016/j.ajhg.2016.12.002)

33

## Preliminary Take-Away Messages

- Possibility and risk are related but they are not the same.
- In the real world, in general, Identifiability will be greater than Distinguishability will be greater than Re-identifiability will be greater than Pragmatic/Contextualized Risk.
- Risk is a joint function of those FOUR characteristics.
- If you do not take all four into account, you will typically over-estimate risk (and over-protect/harm the data).
- Some (e.g., El Emam & associates) build all four into their privacy risk models. Most do not.
- The model provides a model for a model – an example of a data disclosure risk model – and a working vocabulary – for access adjudicators who must explain the basis for decisions.
- A data de-identification framework and methodology must supply tools for estimating the magnitude of key quantities (e.g., distinguishability) and the pragmatic likelihood (risk/benefit) of the actions required to translate the possibility of re-identification into re-identification.
- In reference to the four features of this model – when a person or policy or procedure uses the term “risk” in relationship to a data disclosure - to which (combination) of the four components does the term refer?
- You “calibrate” your data disclosure risk analysis and associated protections in relationship to each of the four components – four sets of activities, and four sets of documentation.

34

# The final ascent – from privacy risk model (principles, guidelines) to standard operating procedures

- Full documentation of model, including references to legislation, regulations or policies; math/stat or computer science publications, official opinions or directives.
- Operational definitions of key constructs.
- Questions keyed to each of the four components.
- Methods for answering the questions.
- Templates for registering answers to the questions.
- Benchmarks or cutoffs for evaluating quantitative risk metrics (where applicable or illuminating).
- Scenario-based methodology – standard framework for characterizing data disclosures – to “stress test” candidate data access management models – including tests against the possibility that assumptions made in any given candidate data disclosure turn out not to be correct.
- While we are at it – a working ***target information architecture*** for health services – to supply a working answer to a basic question: “So what data are we talking about pre-authorizing??”



35



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36