

Disclosure of De-identified PHI HIPAA Policy: Privacy 04

Summary: How to de-identify PHI so that it may be disclosed without authorization

Affected Individuals: Staff at HIPAA covered entities

1.0 PURPOSE

To ensure that when The University of Mississippi (UM) releases protected health information (PHI) without an authorization, in situations where an authorization would normally be required, it is de-identified using the safe harbor method as it is defined by Health Insurance Portability and Accountability Act (HIPAA) Privacy Regulations, 45 CFR Part 164.514.

2.0 SCOPE

The UM Disclosures of De-identified Protected Health Information (PHI) Policy applies to any UM employee who releases PHI without an authorization.

3.1 STANDARDS

Deidentifying PHI requires removing any information that would allow an individual to identify the individual(s) who are the subject of the information. This rule applies even if the person receiving the information would need additional information to identify the subject of the PHI. The following information must usually be removed from the PHI before disclosure. Under some circumstances additional identifiers would need to be removed:

- Names;
- Relatives, household members, or the employer of the subject of the PHI;
- All geographic subdivisions smaller than a state, including street, address, city, county, precinct, zip code, and their equivalent geocodes, except for the initial three digits of a zip code if, according to the current publicly available data from the Bureau of the Census:
 - The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and
 - The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000;

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- All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, date of death; and all ages over 89 and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older;
- Telephone numbers;
- Fax numbers;
- Electronic mail addresses;
- Social security numbers;
- Medical record numbers;
- Health plan beneficiary numbers;
- Account numbers;
- Certificate/license numbers;
- Vehicle identifiers and serial numbers; including license plate numbers;
- Device identifiers and serial numbers;
- Web Universal Resource Locators (URLs);
- Internet Protocol (IP) address numbers;
- Biometric identifiers, including finger and voice prints;
- Full face photographic images and any comparable images; and
- Any other unique identifying number, characteristic, or code.

4.0 CONTACT INFORMATION

For questions about the UM Disclosure of De-identified PHI Policy or for more information, call the Office of General Counsel at 662-915-7014.