

# **TEXAS ASSOCIATION OF COUNTIES HEALTH AND EMPLOYEE BENEFITS POOL HIPAA POLICIES**

## **DE-IDENTIFIED INFORMATION**

Effective Date: March 17, 2003

### **POLICY**

HEBP may use protected health information to create information that does not identify an individual or disclose protected health information to a business associate for such purpose, whether or not the de-identified information is to be used by HEBP.

### **PROCEDURE**

- In appropriate circumstances, HEBP will de-identify an individual's PHI.
- A person with appropriate knowledge and experience with generally accepted statistical and scientific principles and methods for rendering information not individually identifiable will apply such principles and methods as necessary for the person to determine that the risk is very small that the information could be used, alone or in combination with other reasonable available information, by an anticipated recipient, to identify an individual who is a subject of the information.
- The person de-identifying the information will document the methods used to de-identify the information.
- The following identifiers of the individual or of relatives, employers, or household members of the individual, will be removed in order to create de-identified information:
  - Names;
  - All geographic subdivisions smaller than a State, including street address, city, county, precinct, zip code (HEBP may remove all but the first three digits of the zip code under certain circumstances);
  - All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, and date of death;
  - 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;
  - Internet Protocol 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.
- 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 an individual will not be treated as PHI.