

Policies of the University of North Texas Health Science Center	Chapter 14 UNT Health
I. <b>14.224 De-Identification of Protected Health Information</b>	

II.

**Policy Statement**

PHI may used to create information that is not individually identifiable, ie. de-identified. Health information that does not identify an individual and for which there is no reasonable basis to believe that it can be used to identify an individual, is not PHI and is no longer covered by the HIPAA Privacy Standards.

**Application of Policy**

Applies to all UNTHSC providers and employees

**Definitions**

1. De-identified protected health information: means individually identifiable health information (PHI) that is rendered useless (either by statistical application or removal of identifiers) whereby the data is not capable of identifying the individual.
2. Protected Health Information or “PHI” is individually identifiable health information that is transmitted or maintained in any form or medium, including oral, written, and electronic.

**Procedures and Responsibilities**

3. UNTHSC will determine that health information is de-identified only if:
  - a. A UNTHSC employee with appropriate knowledge of and experience with generally accepted statistical and scientific principles and methods for rendering information not individually identifiable:
    - i. By applying such principles and methods, determines that the risk is very small that the information could be used, alone or in combination with other reasonably available information, by an anticipated recipient to identify an individual who is a subject of the information; and
    - ii. Documents the methods and results of the analysis that justify such determination; or
    - iii. The following identifiers of the individual or of relatives, employers or household members of the individual, are removed;
      - a. Names;
      - b. 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:

- i. The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and
  - ii. The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000.
- c. 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;
- d. Telephone numbers;
- e. Fax numbers;
- f. Electronic mail addresses;
- g. Social security numbers;
- h. Medical record numbers;
- i. Health plan beneficiary numbers;
- j. Account numbers;
- k. Certificate/license numbers;
- l. Vehicle identifiers and serial numbers, including license plate numbers;
- m. Device identifiers and serial numbers;
- n. Web Universal Resource Locators (URLs);
- o. Internet Protocol (IP) address numbers;
- p. Biometric identifiers, including finger and voice prints;
- q. Full face photographic images and any comparable images; and
- r. Any other unique identifying number, characteristic, or code, except as permitted for re-disclosures addressed in this policy; and
- i. UNTHSC does not have actual knowledge that the information could be used alone or in combination with other information to identify an individual who is a subject of the information.

Responsible Party: UNTHSC providers and employees

4. UNTHSC may assign a code or other means of record identification to allow information de-identified to be re-identified, provided that:
  - a. The code or other means of record identification is not derived from or related to information about the individual and is not otherwise capable of being translated so as to identify the individual; and
  - b. UNTHSC providers and employees do not use or disclose the code or other means of record identification for any other purpose, and do not disclose the mechanism for re-identification.

Responsible Party: UNTHSC providers and employees

### **References and Cross-references**

45 CFR § 164.514 Other requirements relating to uses and disclosures of protected health information

### **Forms and Tools**

Approved: January 26, 2012

Effective: January 26, 2012

Revised: