

FAMILY HEALTH CENTERS, INC.

SUBJECT: DE-IDENTIFICATION OF PHI – HIPAA PRIVACY

MANUAL: COMPLIANCE

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POLICY

It is the policy of Family Health Centers, Inc. (FHC), in accordance with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule that use and disclosure requirements do not apply to health information that is determined to be de-identified. In order for FHC to use or disclose de-identified health information, it shall take appropriate steps to ensure de-identification.

PROCEDURE

1. Health information that does not identify an individual and there is no reasonable basis to believe that the information can be used to identify an individual is not individually identifiable health information (Protected Health Information). FHC may determine that health information is de-identified if one of the methods described in Articles 1.1 and 1.2 are used.
 - 1.1 A person with appropriate knowledge of and experience with generally accepted statistical and scientific principles and methods for rendering information not individually identifiable applying such principles and methods:
 - 1.1.1 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
 - 1.1.2 Documents the methods and results of the analysis that justify such determination.
 - 1.1.3 Such qualified statistician shall be determined and identified by FHC's Compliance Officer.
 - 1.2 The following identifiers of the individual or of relatives, employers or household members of the individual are removed:
 - 1.2.1 Names
 - 1.2.2 All geographic subdivisions smaller than a state, including street, address, city, county, precinct, zip code if, according to the current publicly available data from the Bureau of the Census:
 - 1.2.2.1 The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and

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1.2.2.2 Initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000.

1.2.3 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 eighty-nine (89) years 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 ninety (90) or older.

1.2.4 Telephone numbers.

1.2.5 Fax numbers.

1.2.6 E-mail addresses.

1.2.7 Social Security numbers.

1.2.8 Medical record numbers.

1.2.9 Health plan beneficiary numbers.

1.2.10 Account numbers.

1.2.11 Certificate/license numbers.

1.2.12 Vehicle identifiers and serial numbers, including license plate numbers.

1.2.13 Device identifiers and serial numbers.

1.2.14 Web Uniform Resource Locators (URLs).

1.2.15 Internet Protocol (IP) address numbers.

1.2.16 Biometric identifiers, including finger prints and voice prints.

1.2.17 Full face photographic images and any comparable images.

1.2.18 Any other unique identifying number, characteristic or code, other than the record identification code described in Article 2 below.

1.2.19 FHC 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.

1.3 FHC's Compliance Officer shall be responsible for determining if the above requirements are met.

2. FHC may assign a code or other means of record identification to allow de-identified information to be re-identified, provided that:

2.1 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.

2.2 FHC does not use or disclose the code or other means of record identification for any other purpose, and does not disclose the mechanism for re-identification.

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3. FHC may use PHI to create de-identified information or disclose PHI to a business associate for such purposes, whether or not the de-identified information is to be used by FHC.
4. Disclosure of a code or other means of record identification designed to enable coded or otherwise de-identified information to be re-identified constitutes disclosure of PHI. If de-identified information is re-identified, FHC may use or disclose such re-identified information as permitted or required under the Privacy Rule.

Development Date: February 2003

Effective Date: April 14, 2003

Revised: July 2005

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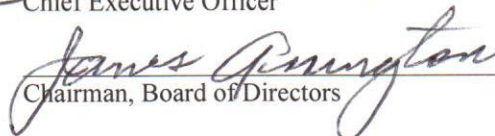
Approved By:


Compliance Officer

8/28/18
Date


Chief Executive Officer

8/28/18
Date


Chairman, Board of Directors

8/28/18
Date