

PATHWAYS CMH

PROCEDURE TITLE: De-identified Information – Appendix 15 of Privacy Policy	CATEGORY: Recipient Rights
EFFECTIVE DATE: April 14, 2003	BOARD APPROVAL DATE: April 14, 2003
REVIEWED DATE: June 2013; July 11, 2014; May 5, 2015; April 22, 2016; April 15, 2017	REVISION(S) TO PROCEDURE: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
RESPONSIBLE PARTY/APPROVAL: Recipient Rights Supervisor or Designee/ Mary J. Swift, CEO	

PURPOSE:

Pathways staff will de-identify a recipient's PHI in compliance with this policy and procedure when there is a need to release information in the absence of valid authorization or business associate agreement for the purposes of accreditation recording, public health, public policy initiatives, compliance audits marketing and/or fundraising.

PROCEDURES:

1. To release health information to a third party in the absence of a valid authorization or business associate agreement the following identifiers must be removed pertaining to the recipient, relatives, employers, or household members of the recipient.
 - A. Names; Last, First, Middle Initial.
 - B. State, including street address, city, county, precinct, zip code.
 - C. All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, date of death.
 - D. Telephone numbers.
 - E. Fax numbers.
 - F. Electric mail addresses.
 - G. Social Security Number.
 - H. Medical Record Numbers.
 - I. Health Plan Identification Numbers.
 - J. Account Numbers.
 - K. Certificate/License Numbers.
 - L. Vehicle Identifiers and Serial Numbers.

- M. Device Identifier Numbers and Serial Number.
 - N. Web Universal Resource Locators.
 - O. Internet Protocol (IP) Address Numbers.
 - P. Biometric Identifiers, including finger and voice prints.
 - Q. Full Face Photographic Images and Any Comparable Images.
 - R. Any other Unique Identifying Number, Characteristic or Code.
2. The staff must not have actual knowledge that the information could be used alone or in combination with other information to identify a recipient who is subject of the information.
 3. Release of de-identified recipient information must be limited to that information which is the minimum necessary to meet the reason for the release of de-identified information

REFERENCES: