COMMUNITY MENTAL HEALTH AUTHORITY

ADMINISTRATIVE POLICY AND PROCEDURES MANUAL				
Chapter **Program Quality**	**Section** **HIPAA**	**Chapter** **05**	**Section** **03**	**Subject** **14**
Subject **De-identifying Individually Identifiable Health Information**	**Authorization**		**Approved: 04/08/03** **Replaces: None**	

Reviewed/No Updates: October 2024; October 2025

I. PURPOSE: To establish policy and procedure regarding the de-identification of individually identifiable health information.

II. APPLICATION: All programs of Gogebic Community Mental Health Authority (GCMHA).

III. DEFINITIONS: Individually identifiable health information is information that is a subset of health information, including demographic information collected from an individual, and:

A. Is created or received by a health care provider, health plan, employer, or health care clearinghouse; and

B. Relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual; and
   1. that identifies the individual; or
   2. with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

IV. POLICY: GCMHA staff will de-identify a recipient's individually identifiable health information when there is a need to release information in the absence of valid authorization or business associate agreement.

V. PROCEDURE:

A. 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:
   1. Names; Last, First Middle Initial
   2. 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:
      a. The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and

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

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 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;

4. Telephone numbers;

5. Fax Numbers;

6. Electric Mail Addresses;

7. Social Security Number;

8. Medical Record Numbers;

9. Health Plan Beneficiary Numbers;

10. Account Numbers;

11. Certificate/License Numbers;

12. Vehicle Identifiers and Serial Numbers, including License Plate Numbers

13. Device Identifier and Serial Numbers;

14. Web Universal Resource Locators (URLs);

15. Internet Protocol (IP) Address Numbers;

16. Biometric Identifiers, including finger and voice prints;

17. Full Face Photographic Images and Any Comparable Images; and

18. Any Other Unique Identifying Number, Characteristic or Code.

B. 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.

C. 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.

VI. REFERENCES AND LEGAL AUTHORITY: 45 CFR Part 164 Section 514

VII. EXHIBITS: None