1.0 PURPOSE

To ensure that when The University of Mississippi Medical Center (UMMC) releases protected health information (PHI) without an authorization, in situations where an authorization would normally be required, it is de-identified using the safe harbor method as it is defined by Health Insurance Portability and Accountability Act (HIPAA) Privacy Regulations, 45 CFR Part 164.514.

2.0 SCOPE

The UMMC Disclosures of De-identified Protected Health Information (PHI) Policy applies to any UMMC employee who releases PHI without an authorization.

3.0 STANDARDS

UMMC will determine that health information is not individually identifiable health information only if they do not have actual knowledge that the information could be used alone or in combination with other information to identify an individual who is the subject of the information and the following identifiers of the individual or of relatives, employers or household members of the individual, are removed:

- Names;
- 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:
  - The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and
  - The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000;
• 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;
• 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 (URLs);
• Internet Protocol (IP) 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.

4.0 CONTACT INFORMATION

For questions about the UMMC Disclosure of De-identified PHI Policy or for more information, call the Office of Integrity and Compliance at 815-3944.