

De-Identifying Clinical Records for Quality Improvement

Introduction

Heraya sometimes requires you to submit clinical records for various purposes such as record keeping quality improvement. When responding to these requests, it is imperative that you are compliant with Federal rules that protect member confidentiality. **Note: These rules do not apply to clinical records submitted to support billing, for Treatment Extension Requests, appeals and other aspects of payment.**

Why do I need to de-identify my clinical records?

The Health Insurance Portability and Accountability Act (HIPAA) requires covered entities to protect member-specific health information, known as Protected Health Information (PHI). However, HIPAA permits the use or disclosure of properly de-identified health information, as it is no longer considered PHI.

What does "de-identify" mean?

The term "de-identify" is from HIPAA and refers to redacting clinical record so that no one can tell who the information is about. PHI is considered to be properly de-identified if all of the 18 specified identifiers are redacted. These 18 identifiers are listed on the next page.

If I am not a covered entity as defined by HIPAA, do I still need to de-identify my clinical records sent to Heraya?

While you may or may not be a "covered entity," Heraya recommends that you take this precautionary measure when responding to requests for clinical records for quality management purposes.

Where can I obtain more information on de-identifying PHI?

The Department of Health and Human Services is the federal agency responsible for administering HIPAA. Below is a link to their website which speaks specifically to this topic:

<http://www.hhs.gov/ocr/privacy/hipaa/understanding/coveredentities/De-identification/guidance.html>

If I have questions, who can I call at Heraya?

The Clinical Services Department may be contacted at 503-203-8333, extension 124.

The following are the 18 identifiers that create the definition of “individually identifiable” and can be used to identify a specific individual.

1. Names of members, spouses, relatives
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. Day and month elements of dates directly related to an individual, such as 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.” **Note: this does not apply to dates of service in chart notes.**
4. Telephone numbers
5. Fax numbers
6. Email addresses
7. Social Security numbers
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 identifiers and serial numbers
14. Web Universal Resource Locators (URLs)
15. Internet Protocol (IP) addresses
16. Biometric identifiers, including finger and voice prints
17. Full-face photographic images and any comparable images
18. Any other unique identifying number, characteristic, or code