

### HIPAA DATA GUIDELINES

Protected Health Information (Identifiable Data)	Limited Data Set	Coded Date Sets	De-Identified Data Sets
<p>PHI includes all individually identifiable health information that is created or received by a LSUHSC or a Business Associate.</p> <p>The following are considered identifiers:</p> <ul style="list-style-type: none"> <li>• Names</li> <li>• Addresses (<i>except state only</i>)</li> <li>• Dates (<i>except year only</i>) directly related in an individual</li> <li>• Telephone and fax numbers</li> <li>• Email addresses</li> <li>• Social Security Number (SSN)</li> <li>• Medical records number (MRN)</li> <li>• Health Insurance numbers</li> <li>• Account numbers</li> <li>• Certificate/license numbers</li> <li>• Vehicle identifiers</li> <li>• Device identifiers &amp; serial numbers</li> <li>• URLs</li> <li>• IP addresses</li> <li>• Biometric identifiers</li> <li>• Full face photographs/videos</li> <li>• Any other unique identifying numbers</li> </ul> <p>A Business Associates Agreement (BAA) is required when LSUHSC/Business Associate and any subcontractor will create, maintain, receive, access, or store PHI on behalf of the Covered Entity/Business Associate <i>prior</i> to use or disclosure of any PHI</p>	<p>A limited data set is stripped of certain direct identifiers specified in the privacy rule.</p> <p>Only the following may be included in a limited data set:</p> <ul style="list-style-type: none"> <li>• Dates</li> <li>• City, state, zip code (no street address)</li> <li>• Age</li> <li>• Any code or identifier not considered PHI</li> </ul> <p>A limited data set may be disclosed to outside entities with patient authorization via informed consent or without patient authorization only if the following conditions are met:</p> <ul style="list-style-type: none"> <li>• The purpose of the disclosure must be for research</li> <li>• The entity receiving the information must sign a Data Use Agreement or have an agreement/contract in place addressing data transfer</li> </ul> <p>A Data Use Agreement (DUA) is required when LSUHSC/Business Associate and any subcontractor or third party will receive a limited data set <i>prior</i> to use or disclosure of the data set.</p>	<p>Data sets are considered “coded” when (1) identifiable information has been replaced with a number, letter, symbol, or any combination thereof and (2) a key to decipher the number, letter, symbol, or combination exists.</p> <p>The Privacy Rule permits LSUHSC/Business Associate to release data that has a <b>random</b> code without obtaining an Authorization and without further restrictions; <b>however</b>, LSUHSC cannot use or disclose the code to the third party and may not disclose its method of re-identifying the information to the third party.</p> <p>If the code is derived from or related to the information about the individual (ex. using a parts of birthday or social security), then a Data Use Agreement (DUA) is required.</p>	<p>A de-identified data set is stripped of all identifiers specified in the privacy rule.</p> <p>The Privacy Rule permits LSUHSC/Business Associate to release data that have been de-identified without obtaining an Authorization and without further restrictions upon use or disclosure because de-identified data is not PHI and, therefore, not subject to the Privacy Rule.</p>
<p>Consult with the LSUHSC-NO IRB (<a href="mailto:IRBOffice@lsuhsc.edu">IRBOffice@lsuhsc.edu</a>) to discuss if your study requires a BAA or DUA.</p>			