

WHO SHOULD USE THIS FORM

All faculty, staff, trainees, and students within the University’s Covered Entity¹ disclosing² Protected Health Information (PHI)³ for purposes other than treatment, payment, or healthcare operations (as defined by HIPAA) must use this form (Researchers – contact the IRB for the research form).

There are two ways within HIPAA to de-identify protected health information.

1. **Safe Harbor Method:** Removal of the 18 identifiers listed on this form; OR
2. **Statistical Analysis Method:** Through a documented statistical analysis submitted on the “Statistical Analysis De-identification Declaration.” There is another form for this purpose.

INSTRUCTIONS

1. Fill out this form prior to disclosure.
2. Acquire appropriate signatures for all documents.
3. Maintain a copy with the information request for data.

If you have questions regarding these requirements, please contact the Privacy Office at 587-9241.

3-DIGIT ZIP CODES:

Regular 5-digit zip codes must be removed for Safe Harbor de-identification. However, the first 3 digits of zip codes may be retained, except for 3-digit zip codes where the population is less than 20,000. All data from these zip codes must be recorded under “000.” According to the 2000 Census, there are currently 17 such codes: 036, 059, 063, 102, 203, 556, 692, 790, 821, 823, 830, 831, 878, 879, 884, 890, and 893. None of these codes are in Utah. The following codes cover the area around the listed towns in nearby Western states:

823	Rawlins, WY	878	Socorro, NM	890	Alamo, NV
830	Jackson, WY	879	Truth or Consequences, NM	893	Ely, NV
831	Kemmerer, WY	884	Tucumcari, NM		

¹ The University’s Covered Entity includes nearly all parts of the University of Utah Health Sciences Center. Contact the HIPAA Privacy Office or go to <http://uuhsc.utah.edu/privacy> for information on the University offices that are inside or outside the Covered Entity.

² *Disclosure* is the release, transfer, provision of access to, or divulging in any other manner of information outside the *Covered Entity* holding the information. (45 CFR 164.501)

³ Protected Health Information (PHI) is information about the past, present, or future physical or mental health of an individual that identifies or could be used to identify the individual and is created or received by a Covered Entity. (45 CFR 160.301, 164.501; information about the provision of health care and payment for health care is included; some educational and employment records are excluded.)

Data Recipient:	Telephone:	Dept:
Description of need for data.		
<p>1. As the data recipient, I declare the following:</p> <p>A. To the best of my knowledge, the information could not be used (alone or with other information) to identify an individual who is a subject of the information, and</p> <p>B. None of the following types of information, regarding subjects or relatives, employers, or household members of subjects, are used or disclosed in the part of this study indicated above:</p> <ol style="list-style-type: none"> 1. Names; 2. All geographic identifiers except state or the first three digits of a zip code (however, all data from the following 17 3-digit zips are combined together under "000": 036, 059, 063, 102, 203, 556, 692, 790, 821, 823, 830, 831, 878, 879, 884, 890, and 893.⁴) 3. The month and day (the year can be kept) from all dates directly related to an individual, including birth date, admission date, discharge date, date of death. Ages over 89 are combined in a single category of "Age 90 and older." 4. Telephone numbers; 5. Fax numbers; 6. Electronic mail 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) 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, except as permitted for re-identification. <p>C. If I assign a code or other means of record identification to allow de-identified information to be re-</p>		

⁴ This list of 3-digit zip codes that must be combined under "000" is based on the 2000 Census. It will need to be updated as future population information becomes available. See, 45 CFR 164.514(b)(2)(i)(B), and 67 FR 53182, 53234 (Aug. 14, 2002).

identified,

1. The code or other means of record identification is not derived from or related to information about the individual and is not otherwise capable of being translated so as to identify the individual, and
2. I will not use or disclose the code or other means of record identification for any purpose other than re-identification, and I will not disclose the mechanism for re-identification.

2. Data Recipient's
Signature:

Date:

3. Data Recipient's position:

If data recipient is a student, volunteer faculty member or staff, a faculty sponsor's signature is required.

• If required:

• Faculty sponsor's signature: _____

Date:

• Faculty sponsor's name: