

## Texas Tech University Health Sciences Center El Paso HIPAA Privacy Policy

<del>Policy: HPP 1.9-De-Identification of Protected Health Information</del>	<del>Effective Date: May 1, 2015-Policy # HPP 1.9</del>
<del>De-Identification of Protected Health Information-Effective Date: May 1, 2015</del>	<del>Last Revision Date: <del>March 21, 2023</del>-March 25, 2025</del>
References: <a href="http://www.hhs.gov/ocr/hipaa">http://www.hhs.gov/ocr/hipaa</a>	
TTUSC El Paso HIPAA Privacy and Security Website: <a href="https://ttuhscep.edu/hipaa/">https://ttuhscep.edu/hipaa/</a>	

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### Policy Statement

Texas Tech University Health Sciences Center El Paso (TTUHSC El Paso) is committed to ensuring the privacy and security of patient health information. Federal law allows certain health care organizations to use or disclose ~~personal-protected~~ health information (PHI) ~~for the purpose of creating de-identified information which isto create de-identified~~ information that has been stripped of any elements that may identify the patient, such as name, birth date, or social security number.

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TTUHSC El Paso will from time to time use de-identified data for various purposes such as research. In doing so, TTUHSC El Paso will ensure that the appropriate administrative and technical processes are in place to properly de-identify PHI, as well as to secure any methods to re-identify, as required under [45 CFR §164.514\(a\)](#) and other applicable federal, state, and/or local laws and regulations.

### Scope

~~This policy applies to all health care clinical service areas owned and/or operated by TTUHSC El Paso~~

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### Policy

1. The following individually identifying elements will be removed or otherwise concealed from PHI in ~~either order~~ to create *de-identified* information:

**Commented [QY1]:** Consider rewrite:  
The following personally identifiable information will be removed or otherwise obscured from PHI to generate de-identified data

- Names
- 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 elements of dates (including year) for all ages over 89, except that such ages and elements may be aggregated into a single category of 90 or older
- Telephone numbers
- Fax numbers
- Electronic mail (email) addresses
- Social Security numbers
- Medical record numbers
- Health plan beneficiary numbers
- Account numbers
- Certificate/license numbers
- Vehicle identification and serial numbers, including license plate numbers

## Texas Tech University Health Sciences Center El Paso HIPAA Privacy Policy

- Device identifiers and serial numbers
  - Web Universal Resource Locators (URLs)
  - Internet Protocol (IP) address numbers
  - Biometric identifiers, including finger or voice prints
  - Full-face photographic images and any comparable images
  - All geographic subdivisions smaller than a state, including street address, city, county, precinct, zip code, and equivalent geocodes
  - Full-face photographic images and any comparable images
  - All geographic subdivisions smaller than a state, including street address, city, county, precinct, zip code, and equivalent geocodes
  - Any other unique identifying number, characteristic, or code other than a code assigned to a record to permit TTUHSC El Paso to re-identify the information
  - The initial three digits of a zip code may be used if, according to the 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.
2. If any listed identifiers are not removed, then the information will only be disclosed when the Institutional Privacy Officer:
- Determines that the risk is very ~~small-minimal~~ and that the information could be used alone or in combination with other reasonably available information by an anticipated recipient to identify an individual who is a subject of the information and
  - Document the methods and results of the analysis that justify such determination
3. Identifiable information may be released to researchers when IRB issues a waiver of authorization.

Knowledge of a violation or potential violation of this policy must be reported directly to the Institutional Privacy Officer or the Fraud and Misconduct Hotline at (866) 294-9352 or [www.ethicspoint.com](http://www.ethicspoint.com) under Texas Tech University System.

### **Frequency of Review**

This policy will be reviewed on each odd-numbered (ONY) by the Institutional Privacy Officer, and the HIPAA Privacy and Security Committee, but may be amended or terminated at any time.

Questions regarding this policy may be addressed to the Institutional Privacy Officer or Institutional Compliance Officer.

**Review Date:** ~~March 3, 2023~~ March 14, 2025

**Revision Date:** February 2, 2017, May 21, 2019, January 19, 2021, March 21, 2023, ~~March 25, 2025~~

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