

**HIPAA COLLABORATIVE OF WISCONSIN
PROTECTED HEALTH INFORMATION DISCLOSURES
DE-IDENTIFICATION VS. SUMMARY VS. LIMITED DATA SET INFORMATION**

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164.514(a)— De-identification: requires that we remove ALL of the following. See also the catch all provision at (ii)	164.504— Summary Health Information used only for health plan disclosures to the plan sponsor for purpose of obtaining premium bids, or modifying, amending, or terminating group health plan.	164.514(e)— Limited Data Set to be used only for 1) research, 2) public health, 3) Health care operations Requires that we remove:
	(1) Summarizes the claims history, claims expenses, or type of claims experienced by individuals for whom a plan sponsor has provided benefits under a group health plan, (2) Requires that we remove:	
A) Names;	Same as column 1	Same as column 1
B) 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: (1) The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and (2) The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000.	Same as column 1 except have ability to include zip code to the five-digit zip code.	(ii) Postal address information, other than town or city, State, and zip code; (i.e. ability to include any other geographic subdivision except street address)
(C) 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;	Same as column 1	(Dates allowed, e.g. admission, discharge, date of birth. Minimum Necessary Rule still applies so CE & researcher must agree dates are necessary.)
(D) Telephone numbers;	Same as column 1	Same as column 1

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(E) Fax numbers;	Same as column 1	Same as column 1
(F) Electronic mail addresses;	Same as column 1	Same as column 1
(G) Social security numbers;	Same as column 1	Same as column 1
(H) Medical record numbers;	Same as column 1	Same as column 1
(I) Health plan beneficiary numbers;	Same as column 1	Same as column 1
(J) Account numbers;	Same as column 1	Same as column 1
(K) Certificate/license numbers;	Same as column 1	Same as column 1
(L) Vehicle identifiers and serial numbers, including license plate numbers;	Same as column 1	Same as column 1
(M) Device identifiers and serial numbers;	Same as column 1	Same as column 1
(N) Web Universal Resource Locators (URLs);	Same as column 1	Same as column 1
(O) Internet Protocol (IP) address numbers;	Same as column 1	Same as column 1
(P) Biometric identifiers, including finger and voice prints;	Same as column 1	Same as column 1
(Q) Full face photographic images and any comparable images;	Same as column 1	Same as column 1
R) Any other unique identifying number, characteristic, or code;	Same as column 1	
(ii) The covered entity does not have actual knowledge that the information could be used alone or in combination with other information to identify an individual who is a subject of the information	(Unclear, if health plan can disclose PHI which plan sponsor could identify an individual)	(No catch all provision)

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