

University of Colorado Health Sciences Center
HIPAA Policy

Policy: 4.5
Limited Data Sets

Latest Revision: 03/22/03
Page: 1 of 3

I. Purpose, Reference, and Responsibility

- A. Purpose: To provide guidance to members of the UCHSC workforce who wish to provide or use limited data sets for the purpose of research, public health or health care operations.
- B. Reference
- 45 C.F.R. §164.514(e)
- C. Responsibility: It is the responsibility of any member of the UCHSC workforce who wishes to use or disclose limited data sets to ensure that the use or disclosure of that information complies with this policy.

II. Applicability and Definitions

- A. Applicability This policy applies to the use or disclosure by UCHSC for the purpose of research, public health, or health care operations of protected health information ("PHI") which has had certain direct identifiers removed so that the information qualifies as a limited data set. Sharing this information with others does not require an authorization, as long as the conditions set forth below have been met.
- B. Definitions
- Disclosure
Health Care Operations
Protected Health Information ("PHI")
Secretary
Use
Workforce

University of Colorado Health Sciences Center
HIPAA Policy

Policy: 4.5
Limited Data Sets

Latest Revision: 03/22/03
Page: 2 of 3

III. Policy

A. General

UCHSC may use or disclose certain types of PHI without the need for an authorization as long as:

- 1) The following identifiers of the individual, or of the relatives, employers, or household members of the individual have been removed:
 - a) Names;
 - b) Postal address information, other than town and city, State, and zip code;
 - c) Telephone numbers;
 - d) Fax numbers;
 - e) Electronic mail addresses;
 - f) Social security numbers;
 - g) Medical record numbers;
 - h) Health plan beneficiary numbers;
 - i) Account numbers;
 - j) Certificate/license numbers;
 - k) Vehicle identifiers and serial numbers, including license plate numbers;
 - l) Device identifiers and serial numbers;
 - m) Web Universal Resource Locators (URLs);
 - n) Internet Protocol (IP) address numbers;
 - o) Biometric identifiers, including finger and voice prints; and,
 - p) Full face photographic images and any comparable images.
- 2) The limited data set may only be used or disclosed for the purposes of research, public health, or health care operations.
- 3) Before a limited data set may be disclosed, a data use agreement must be in place between the UCHSC and the limited data set recipient.

University of Colorado Health Sciences Center
HIPAA Policy

Policy: 4.5
Limited Data Sets

Latest Revision: 03/22/03
Page: 3 of 3

- 4) If the UCHSC knows of a pattern of activity or practice of the limited data set recipient that constitutes a violation of the data use agreement, the UCHSC must:
 - a) Attempt to end the violation; and
 - b) If the attempt is unsuccessful:
 - i) Discontinue disclosure of PHI to the recipient; and
 - ii) Report the problem to the Secretary.

- 5) Before a limited data set may be used, the person who wishes to use the limited data set must document in writing that all 16 identifiers (listed above) have been removed.