



## Oklahoma State University

<b>Title: Re-Identification</b>	<b>Policy #: PRV-07.02</b>
<b>Category: HIPAA Compliance</b>	<b>Authority: 45 CFR § HIPAA SECTION: 164.514(c)</b>
<b>Standard: De-Identification of Protected Health Information</b>	<b>Responsibility: Health Care Components</b>
<b>Effective Date: 4/14/2003</b>	<b>Page 1 of 2</b>
<b>Approved By: OSU Legal Counsel</b>	<b>Revised: 7/1/2013</b>

### **PURPOSE:**

To identify how OSU may once again use and protect de-identified information through the re-identification process.

### **POLICY:**

OSU may assign a code or other means of record identification to allow information de-identified under this section to be re-identified by the covered entity, provided that: *§164.514(c)*

1. Derivation - 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 *§164.514(c)(1)*
2. Security – OSU does not use or disclose the code or other means of record identification for any other purpose, and does not disclose the mechanism for re-identification. *§164.514(c)(2)*

### **PROCEDURE:**

If, in the process of collecting data and de-identification of patient data, the OSU agent wishes to assign an identifier to each record, so if at some point in the future the records can be re-identified then the Agent may do so. Any numbering sequence may be used including but not limited to clinical trial numbers, other characteristic, or code.

Such identifier of each record shall not be used on any published or final reports, or data that is sent out or disclosed.

Identifiers, outside the required 18 that are to be de-identified, are to be used only for purposes specific to the Agent in putting together data or reports, and shall not be disclosed.

### **REFERENCE:**

Guidance Regarding Methods for De-Identification of Protected Health Information in Accordance with the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule; Sept 4, 2012.



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