

DE-IDENTIFIED HEALTH INFORMATION

POLICY - De-Identified Health Information. We may use and disclose de-identified health information without restriction. We must treat any key or other means to re-identify coded health information as protected health information.

POLICY - Creating De-Identified Health Information. We may use protected health information, and disclose it to a business associate, to create de-identified health information.

PROCEDURE

De-Identifying Health Information. Health information may be de-identified under the supervision and subject to the documented approval of our Privacy Officer as follows:

- **Statistical Expert.** A statistical expert, with knowledge and experience in generally accepted statistical and scientific principles and methods for rendering information not personally identifiable, may determine and document that the risk is very small that health information we have had de-identified could be used, alone or in combination with other reasonably available information, by an anticipated recipient to identify the individual who is its subject.
- **Identifier Removal.** All identifiers of the individual, relatives, employers and household members associated with the health information may be removed. We must have no actual knowledge that the information remaining after stripping these identifiers could be used, alone or in combination with other information, to identify the individual.

POLICY - Re-identification Codes. Any code or means employed to permit re-identification of de-identified health information must not be derived from or relate to any individual whose information has been de-identified, be capable of translation to identify an individual, or be used or disclosed for any purpose other than re-identification of de-identified health information.

POLICY - Documentation. The Privacy Officer will retain, on paper or electronically, the documentation we obtain or receive in connection with the de-identification of protected health information until 6 years after the later of its creation or last effective date.