

LIMITED DATA SET

POLICY - Limited Data Set Use and Disclosure. We may use a limited data set, and disclose it to a recipient with which we have a data use agreement, for research, public health or health care operations.

PROCEDURE

Data Use Agreement. You must obtain a data use agreement signed by the intended recipient of a limited data set before you may disclose a limited data set that has been approved by our Privacy Officer to that recipient.

Approval Required. Submit the completed form to our Privacy Officer for approval.

If approved, obtain the signature of the intended recipient on the data use agreement before disclosing the limited data set. Send the original of the signed data use agreement to our Privacy Officer. Retain a copy for your department's file.

POLICY - Limited Data Set Creation. We may use protected health information and disclose it to a business associate to create a limited data set for use by us or for disclosure to another (including a business associate that created it).

PROCEDURE

Minimum Necessary. We may disclose only the minimum protected health information necessary to create a limited data set.

Limited Data Set Use and Disclosure. A limited data set must exclude all direct identifiers of each individual whose protected health information is included and of each of those individuals' relatives, household members, and employers. It may contain any other data, including age, any element of dates (e.g., birth dates, admission dates, discharge dates, death dates), any geographic locator broader than postal addresses (e.g., municipalities, States, zip codes), and any unique identifying number, characteristic or code.

Approval Required. Our Privacy Officer must confirm that data qualifies as a limited data set that satisfies the minimum necessary limitation before it may be used or disclosed for one of the permitted purposes of research, public health, or health care operations.

Minimum Necessary. A limited data set may contain only the minimum necessary protected health information for the purpose for which the limited data set is to be used or disclosed.

POLICY - Data Use Agreement Compliance. If we learn that a recipient of a limited data set from us has materially breached the data use agreement, we will require the recipient to promptly cure the breach. If the recipient fails to cure the breach to our satisfaction, we will discontinue disclosing protected health information through the limited data set or otherwise and report the recipient's breach to HHS.

PROCEDURE - Data Use Agreement Compliance. You must immediately notify our Privacy Officer or our Legal Department if you learn that a recipient of a limited data set from us has breached the data use agreement.

POLICY - Documentation. The Privacy Officer will retain, on paper or electronically, the data use agreement or other documentation we obtain or receive in connection with limited data sets until 6 years after the later of its creation or last effective date.