HIPAA DATA GUIDELINES

Protected Health Information (Identifiable Data)	Limited Data Set	Coded Date Sets	De-Identified Data Sets
PHI includes all individually identifiable health information that is created or received by a LSUHSC or a Business Associate. The following are considered identifiers: • Names • Addresses (*except state only*) • Dates (*except year only*) directly related in an individual • Telephone and fax numbers • Email addresses • Social Security Number (SSN) • Medical records number (MRN) • Health Insurance numbers • Account numbers • Certificate/license numbers • Vehicle identifiers • Device identifiers & serial numbers • URLs • IP addresses • Biometric identifiers • Full face photographs/videos • Any other unique identifying numbers A Business Associates Agreement (BAA) and Data Use Agreement (DUA) is required when LSUHSC/Business Associate and any subcontractor will create, maintain, receive, access, or store PHI on behalf of the Covered Entity/Business Associate *prior* to use or disclosure of any PHI	A limited data set is stripped of certain direct identifiers specified in the privacy rule. Only the following may be included in a limited data set: • Dates • City, state, zip code (no street address) • Age • Any code or identifier not considered PHI A limited data set may be disclosed to outside entities with patient authorization via informed consent or without patient authorization only if the following conditions are met: • The purpose of the disclosure must be for research • The entity receiving the information must sign a Data Use Agreement or have an agreement/contract in place addressing data transfer A Data Use Agreement (DUA) is required when LSUHSC/Business Associate and any subcontractor or third party will receive a limited data set *prior* to use or disclosure of the data set.	Data sets are considered "coded" when (1) identifiable information has been replaced with a number, letter, symbol, or any combination thereof and (2) a key to decipher the number, letter, symbol, or combination exists. The Privacy Rule permits LSUHSC/Business Associate to release data that has a **random** code without obtaining an Authorization and without further restrictions; **however**, LSUHSC cannot use or disclose the code to the third party and may not disclose its method of re-identifying the information to the third party. A Data Use Agreement (DUA) is required when LSUHSC/Business Associate and any subcontractor or third party will receive a coded data set *prior* to use or disclosure of the data set	A de-identified data set is stripped of all identifiers specified in the privacy rule. The Privacy Rule permits LSUHSC/Business Associate to release data that have been de-identified without obtaining an Authorization and without further restrictions upon use or disclosure because de-identified data is not PHI and, therefore, not subject to the Privacy Rule. A Data Use Agreement (DUA) is required when LSUHSC/Business Associate and any subcontractor or third party will receive a de-identified data set *prior* to use or disclosure of the data set