

**EMPLOYEE GROUP INSURANCE  
TREATMENT OF PROTECTED HEALTH INFORMATION**

<b>Section 4.13: De-identified Information</b>	<b>Page: 1 of 1</b>
<b>Effective Date:</b> April 14, 2003	

**POLICY**

De-identified Information shall not be subject to the protections and rights set forth in this Manual, but an identifying code shall be.

**4.13(1) De-identified Information Is Not PHI**

For all purposes, De-identified Information is not PHI and therefore shall not be subject to this Manual as PHI, provided that Subsection 4.13(2) of this Section is not violated.

**4.13(2) Use of Identifying Code for Re-identification**

If EGI creates De-identified Information, EGI may assign a code (or other means of record identification) to allow such information to be re-identified by EGI, provided that such code 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. EGI shall not Use or Disclose such code, except that EGI may Use or Disclose to a Business Associate such code in order to re-identify the De-identified Information for purposes consistent with this Manual. Disclosure of a code must be approved by the Contact Person in consultation with the Privacy Officer.

**REFERENCES/CITATIONS**

45 C.F.R. §§ 164.502(d)(2), 164.514(a)-(c)

65 Fed. Reg. at 82,499, 82,542-43, 82,708-12 (Dec. 28, 2000); 67 Fed. Reg. at 53,232-34 (Aug. 14, 2002)