



ADMINISTRATIVE PRACTICES MANUAL

Limited Data Set (LDS) Policy

PURPOSE

To establish procedures for utilizing a Limited Data Set (LDS).

PROCEDURE

A LDS may be used or disclosed only for the purposes of research, public health oversight, or health care operations and only when there is a Data Use Agreement in place. All users of a LDS will comply with the minimum use requirements. A LDS does not need to be recorded in the **Accounting of Disclosure Log**.

A LDS is Protected Health Information (PHI) that excludes the following direct identifiers of the individual or of relatives, employers, or household members of the individual:

1. Names;
2. Postal address information, other than town or city, state, and zip code;
3. Telephone or fax numbers;
4. Electronic mail addresses;
5. Social security numbers;
6. Medical record numbers;
7. Health plan beneficiary numbers;
8. Account numbers;
9. Certificate/license numbers;
10. Vehicle identifiers and serial numbers, including license plate numbers;
11. Device identifiers and serial numbers;
12. Web Universal Resource Locators (URLs);
13. Internet Protocol (IP) address numbers;
14. Biometric identifiers, including finger and voice prints; and
15. Full face photographic images and any comparable images.

A LDS may include the following PHI:

1. Dates such as admission, discharge, service, date of birth, or date of death;
2. City, state, 5 digit or more zip code; or
3. Ages, in years, months, days or hours

Prior to disclosing a LDS, a Data Use Agreement must be in place and contain the following information:

1. Establish the permitted uses and disclosures of the LDS;
2. Identify who may use or receive the information;
3. Prohibit the recipient from using or further disclosing the information, except as permitted by the Data Use Agreement or as permitted by law;
4. Require the recipient to use appropriate safeguards to prevent a use or disclosure that is not permitted by the Data Use Agreement;
5. Require the recipient to report to Dane County any unauthorized use or disclosure of which it becomes aware;

6. Require the recipient to ensure that any agents (including a subcontractor) to whom it provides the information will agree to the same restrictions as provided in the Data Use Agreement; and
7. Prohibit the recipient from identifying the information or contacting the clients/patients.

DOCUMENTATION

Dane County will maintain the documentation associated with this policy for a minimum of seven years.

ROLES & RESPONSIBILITIES

The HIPAA Privacy & Security Officer is responsible for the implementation, maintenance, and adherence to this policy.

RELATED DOCUMENTS

Definitions

DOCUMENT VERSION HISTORY

Original: 08/2023

Reviewed: 09/2024