



Research Informatics Technical Policy Committee
Friday, December 14, 2012
2:00-3:00 p.m.
KCBD 10th Floor South Conference Room

Meeting Minutes

In Attendance: R. Grossman (chair); R. Engelmann, R. Gopalakrishnan, J. Moses, S. Volchenboum, D. Saner; *Ex Officio*: S. Birz, H. Lawrence

Approval of the Minutes

The minutes from the October 19, 2012 meeting were tabled for approval following distribution.

De-identification of PHI

Mr. Saner reported that the US Department of Health and Human Services recently released guidelines for de-identification of PHI, providing two acceptable methods: Safe Harbor and Expert Determination. Safe Harbor is a removal of all 18 types of identifiers for the patient, family members, and guarantors. In the Expert Determination method, statistical or scientific principles are applied to determine that the risk of identification is acceptably low, although a very small risk may remain. A statistical means for data obfuscation is also required for use with the Expert Determination method, such as date shifting or reporting "days since birth." Mr. Saner provided detailed examples of how these two methods and the means for obfuscating dates could be implemented for the CRDW and used to meet research data requests. Following a discussion, the Committee recommended that investigators should determine the most appropriate method of de-identification for their data requests, and when Expert Determination is used, the researchers should select the method of date obfuscation most suitable to their research. The Committee further recommended that when using Expert Determination for date shifting, the investigators should sign a Data Use Agreement including the following provisions: a) the Data User may share the data only with faculty and staff in the researcher's lab and associated with the specific study for which the data was requested and approved by the Data Use Committee, b) the Data User may not attempt to re-identify subjects, and c) the data will not be incorporated into a datamart unless the datamart becomes a CRDW Affiliated Datamart.

The Committee suggested that a process for controlling the use of data outside the University be discussed at the next meeting.

Executive Session

Further topics were discussed in an Executive Session.

The meeting adjourned at 3:10 p.m.