



A Case Example: CHHS Data De-Identification Guidelines

Improving Public Health Data Dissemination
through Policy and Tools

June 23, 2016

A Case Example from California

- California Health and Human Services Agency (CHHS) includes 12 departments and 3 offices
 - Diverse services
 - Diverse laws affecting data sharing
 - Diverse practices
- CHHS Open Data Portal Driving Change
 - Increased availability of data
 - Data side by side from multiple departments
 - Building consistency across programs

Data De-identification Guidelines (DDG) Workgroup

- Convened in April 2015
 - Included representation from all CHHS departments and offices
 - Included training in current practices for de-identification
- Considerations
 - California Information Practices Act
 - CHHS Information Governance Structure
 - HIPAA Impacted Programs

A Starting Point

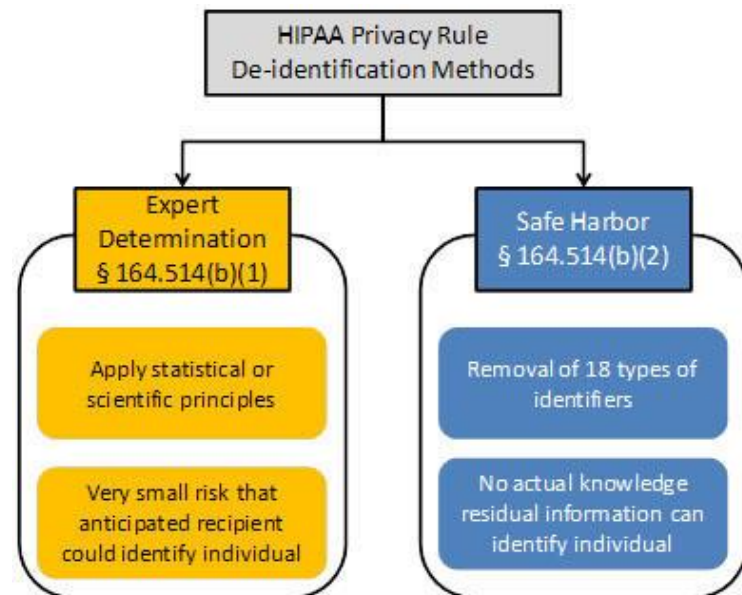
Public Aggregate Reporting for Department of Health Care Services (DHCS) Business Reports

- Finalized August 2014
- Serve as de-identification guidelines to support public reporting for DHCS
- Developed through department-wide workgroup that reviewed current practices throughout the country
- Based on HIPAA standard for data de-identification
- <http://www.dhcs.ca.gov/dataandstats/Pages/PublicReportingGuidelines.aspx>

DHCS Public Data De-identification

- Data must be de-identified in accordance with law
- DHCS is a HIPAA Covered Entity
- HIPAA provides two methods to achieve the de-identification standard:

- Expert Determination
- Safe Harbor



What Usually Leads to Expert Determination?

■ Time

- The time period is less than a year
- As of a specific delivery date

■ Geography

- Less than statewide

■ Other

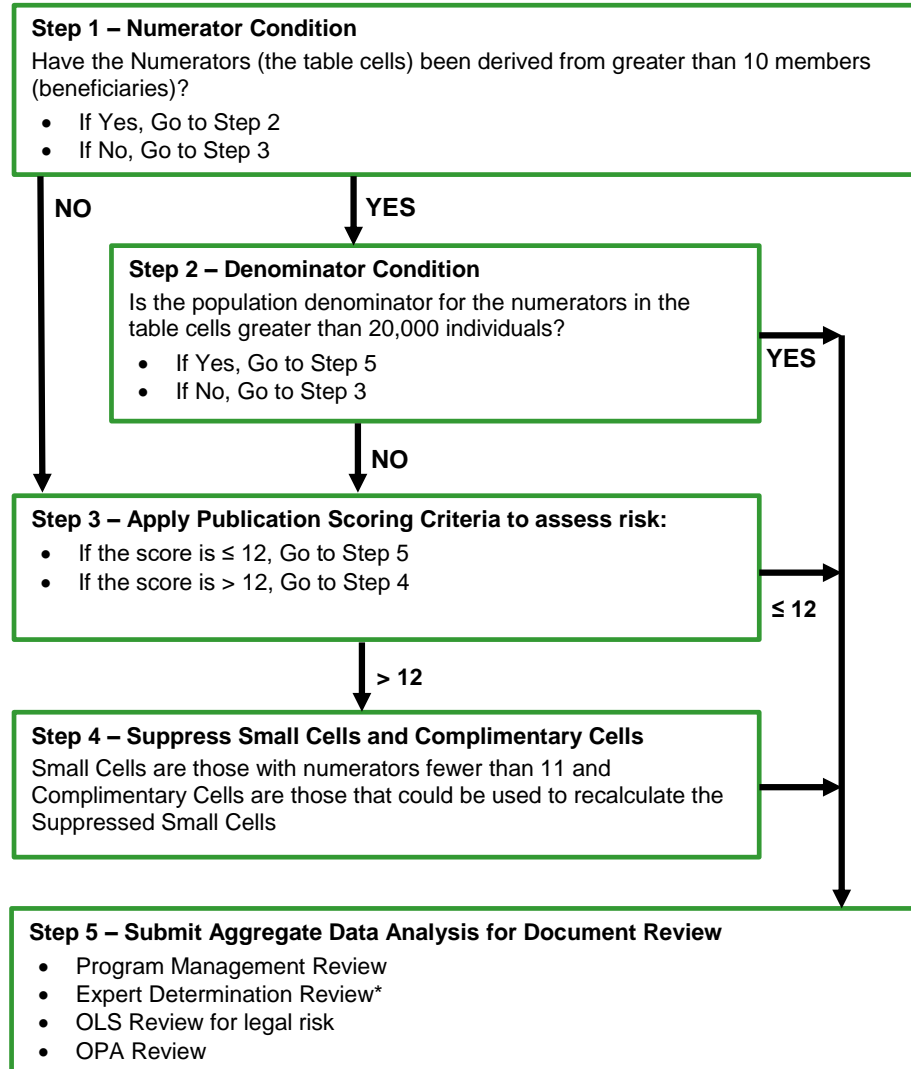
- Rare diagnosis
- Specific combinations of variables

A stepwise decision tree to assess aggregate data for de-identification

Serves as a tool and guideline for the Expert Determination

Figure 3: Reporting Assessment Decision Tree

Assesses risk for data release of aggregate data through a stepwise process. Aggregate data may be derived from record level data with identifiers, record level data without identifiers or previously aggregated data.



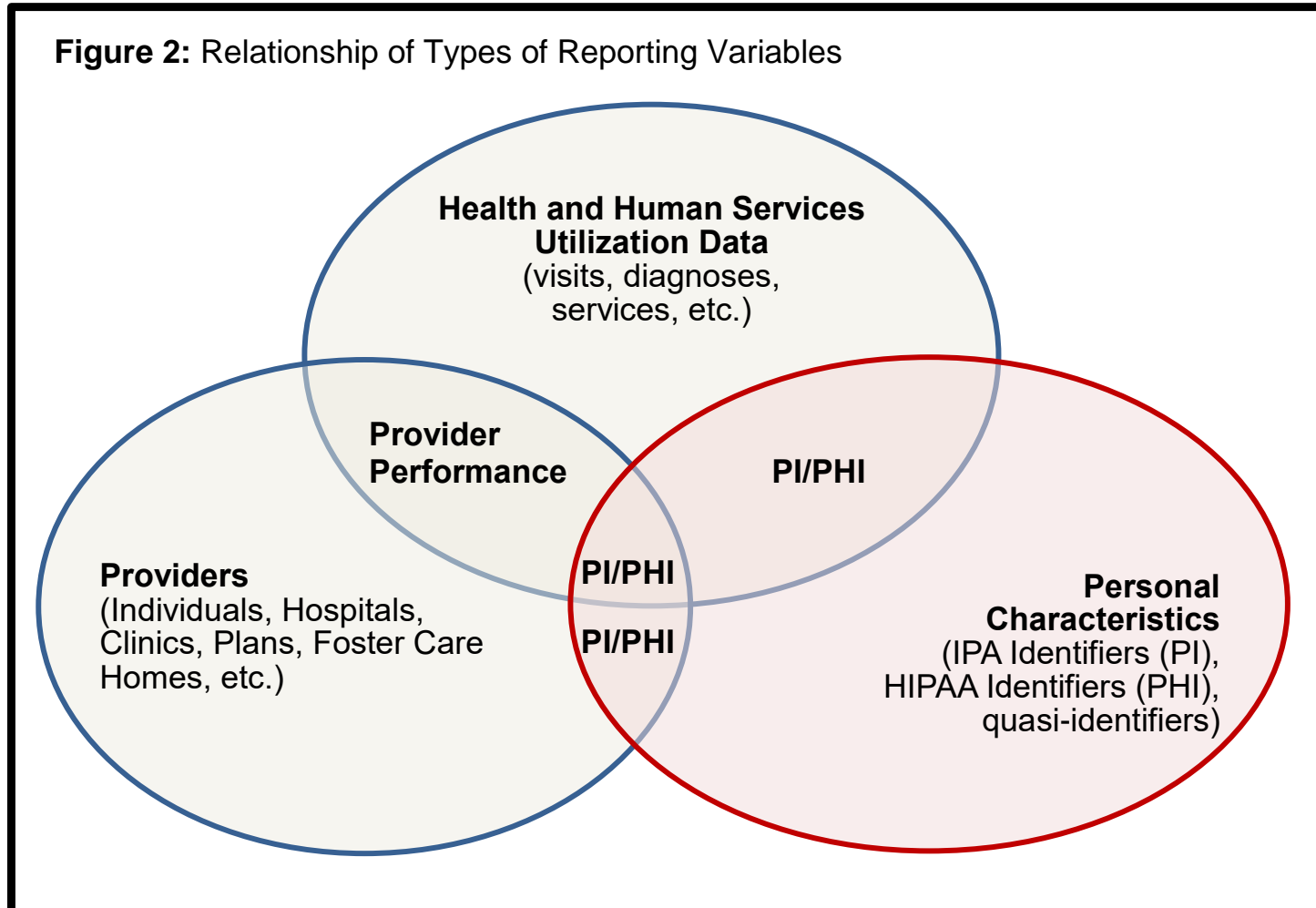
* I Review for Expert Determination will be performed by individuals who have been qualified as experts by OLS and who meet the HIPAA Privacy Rule implementation specifications: "A person with appropriate knowledge of and experience with generally accepted statistical and scientific principles and methods for rendering information not individually identifiable." [45 CFR Section 164.514(b)(1)]

CHHS DDG Process

- DDG Workgroup was convened in April 2015 with representation of all departments / offices in CHHS
- A series of drafts of the DDG reviewed by departments and offices and the Risk Management Subcommittee
- NORC provided an external review of draft version 0.3
- Draft versions 0.4 through 0.8 have been the result of
 - Feedback from NORC
 - DDG Workgroup reviews
 - CHHS Governance reviews

Personal Characteristics of Individuals

Figure 2: Relationship of Types of Reporting Variables



Next Steps

- Continuing to learn a shared language
- Finalizing the CHHS DDG
- CHHS departments and offices will adopt the CHHS DDG for each department and office
- Creates a shared conversation within CHHS and with stakeholders
- Continue to support CHHS Open Data Portal



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