



Companion Instruction Guide | Request for CO APCD Data

APCD Data Products:

Custom Report: A Custom Report means any report generated based on the APCD that is not provided as a Public Facing Report available through www.comedprice.org. Similar to the Public Facing Reports, Custom Reports contain a summary or analysis of data derived from the Colorado APCD database. Examples of data summaries or analyses include counts; totals; rates per thousand; index values; and other standardized metrics. A Custom Report will never display claims line or member level detail. A Custom Report may provide summary level statistics or analysis for subpopulations not otherwise available or identified in Public Facing Reports.

De-Identified Data Set: De-Identification of Protected Health Information (PHI): Health information that does not identify an individual and with respect to which there is no reasonable basis to believe that the information can be used to identify an individual is not individually identifiable health information (45 CFR § 164.514(a)).

The following identifiers of the individual or of relatives, employers, or household members of the individual must be removed to meet the HIPAA standard for de-identification at (45 C.F.R. 164.514(b)(2)):

- a. Names;
- b. Geographic subdivisions smaller than a State, including street address, city, county, precinct, zip code and their equivalent geocodes except for the initial three digits of a zip code if, according to the currently publicly available data from the Bureau of the Census:
 - i. The geographic unit formed by combining all zip codes with the same three initial digits containing more than 20,000 people; and
 - ii. The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000.
- c. All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, date of death; and all ages over 89 and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older;
- d. Telephone numbers (not collected by the CO APCD);
- e. Fax numbers (not collected by the CO APCD);
- f. Electronic mail addresses (not collected by the CO APCD);
- g. Social security numbers;
- h. Medical record numbers;
- i. Health plan beneficiary numbers;



- j. Account numbers;
- k. Certificate/license numbers;
- l. Vehicle identifiers and serial numbers, including license plate numbers (not collected by the CO APCD);
- m. Device identifiers and serial numbers (not collected by the CO APCD);
- n. Web Universal Resource Locators (URLs) (not collected by the CO APCD);
- o. Internet Protocol (IP) address numbers (not collected by the CO APCD);
- p. Biometric identifiers, including finger and voice prints (not collected by the CO APCD);
- q. Full face photographic images and any comparable images (not collected by the CO APCD);
- and
- r. Any other unique identifying number, characteristic, or code, except as permitted by paragraph (c) of 45 CFR § 164.514 (not collected by the CO APCD).

Limited Data Set: A limited data set contains some protected health information data elements but must exclude the following direct identifiers of the individual or of relatives, employers, or household members of the individual (45 C.F.R. 164.514(e)(2)).

A limited data set can include dates specific to an individual with month and day level detail, e.g., dates of service, DOB, and 5 digit zip code.

Identified Data Set: Identifiable Information refers to analytical datasets generated based on the APCD that include Protected Health Information (PHI) such that they do not meet the HIPAA definition of either De-Identified Data or a Limited Data Set.

Releases of Identifiable Information require DRRC review. Because Identifiable Information contains multiple PHI data elements, there is a greater risk that the data could be used along with other information to identify a specific individual. Such releases require an extended Data Use Agreement to be executed between CIVHC in its role as APCD Administrator and the Applicant. The terms of this extended DUA will prohibit the Applicant from using or disclosing the APCD data in any manner other than HIPAA allows for a Covered Entity.

Due to the sensitivity of health care claims and related data, requests for Identifiable Information must include either: (i) an Institutional Review Board (IRB) or Privacy Board waiver approval, as required by 45 CFR 164.512(i); or (ii) proof of patient authorization.

This type of request is expected to come from:

1. Researchers seeking to use the data for comparative effectiveness research; or
2. Health Care Providers seeking to use the data for comparative effectiveness research or health care operations purposes. Additional requirements will apply in the case of a request for Identifiable Information from providers for health care operations purposes.



A request for Identifiable Information may require approval of the DRRC acting in the capacity of a Privacy Board.