

Restricted Information Definitions

Below are definitions for Restricted Information and other associated terms as used in the UCLA Health System and David Geffen School of Medicine at UCLA (hereafter referred to as “UCLA Health”) policies.

“Restricted Information” (as defined by UC Policy IS-3, Electronic Information Security) describes any confidential or Personal Information that is protected by law or policy and that requires the highest level of access control and security protection, whether in storage or in transit. This includes Personal Information, PHI and ePHI as defined in this section but could also include other types of information such as research data.

“Protected health information” or “PHI” is any individually identifiable health information, in any form or media, whether electronic, paper, or oral. “Individually identifiable” means that the health or medical information includes or contains any element of personal identifying information sufficient to allow identification of the individual, such as the patient’s name, address, electronic mail address, telephone number, or social security number, genetic or other information that, alone or in combination with other publicly available information, reveals the individual’s identity. PHI includes: medical information; patient billing and health insurance information; and applies to a patient’s past, current or future physical or mental health, or treatment.

“Electronic Protected Health Information” or “ePHI” is PHI that is transmitted by electronic media or is maintained in electronic media. For example, ePHI includes all data that may be transmitted over the Internet, or stored on a computer, a CD, a disk, magnetic tape or other media.

Below are listed the 18 identifiers that must be removed to consider data de-identified according to the HIPAA Privacy Rule. Note it only takes one identifier for data to be considered as containing PHI.

- Name (includes initials)
- Street Address, City, State and Zip code
- Dates (birth, death, treatment, etc.)
- Phone
- FAX
- Email
- SSN
- Med. Rec. #
- Account #
- Health Plan Beneficiary #
- Certificate License #
- Vehicle ID (VIN) & Drivers License ID
- Device ID or Serial #
- Web URL
- IP Address
- Biometric IDs, including finger- or voice- prints
- Full-face photos or comparable images
- Any other unique ID #, characteristic or code.

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“Personal Information (PI)” as used in this policy means either of the following:

- (1) An individual’s first name or first initial and last name in combination with any one or more of the following data elements when either the name or the data elements are not encrypted:
 - (A) social security number,
 - (B) driver’s license number or California identification card number,
 - (C) account number, credit, or debit card number, in combination with any required security code, access code, or password that would permit access to an individual’s financial account,
 - (D) medical information,
 - (E) health insurance information; or
 - (F) information or data collected through the use or operation of an automated license plate recognition system as defined in California Civil Code §1798.90.5; or
- (2) A user name or email address, in combination with a password or security question and answer that would permit access to an online account.

“Medical Information” means any individually identifiable information, in either electronic or physical form, regarding an individual's medical history, mental or physical condition, or medical treatment or diagnosis by a health care professional, and which may be in the possession of or derived from a health care provider, health care service plan, pharmaceutical company or contractor.

“Health insurance information” means an individual's health insurance policy number or subscriber identification number, any unique identifier used by a health insurer to identify the individual, or any information in an individual's application and claims history, including any appeals records.