

**County Of San Diego
Health and Human Services Agency (HHSA)**

**SUBJECT: De-Identifying Protected Information and
Limited Data Sets**

NO: HHSA-L-21

PAGE: 1 of 1

DATE: August 26, 2025

REFERENCE: Health Insurance Portability and Accountability Act

POLICY: In compliance with State and federal laws and regulations, HHSA programs may disclose protected information without the individuals' authorization if it is de-identified or disclosed as part of a limited data set. Business Assurance and Compliance shall establish procedures for handling requests for de-identified information and limited data sets.

PROCEDURES: See related procedures and forms at www.cosdcompliance.org.

RESPONSIBILITIES: The Health Insurance Portability and Accountability Act (HIPAA) outlines requirements regarding the confidentiality of protected information and methods for disclosing de-identified or limited data sets. Compliance with these regulations is addressed in procedures maintained by Business Assurance and Compliance.

DEFINITIONS: See HHSA Policy L-30 Privacy Definitions.

QUESTIONS/INFORMATION: Please contact HHSA Business Assurance and Compliance by email at Compliance.HHSA@SDCounty.ca.gov or by phone at (619) 237-8571.

Approved: _____



Christy Carlson
Director
Business Assurance & Compliance