UNIVERSITY OF PITTSBURGH
ULS
UNIVERSITY LIBRARY SYSTEM

Archives & Special Collections
University Library System
University of Pittsburgh

Policy on Access to Personal Medical and Health Information in Collections

A number of archival collections focusing on the history of medicine and healthcare contain information that is not openly available for research due to individual privacy concerns. The policy contained herein serves to protect the personal and private health information of professionals, patients, and researchers included in those collections. While the University Library System (ULS) at the University of Pittsburgh (Pitt) is not a Covered Entity, as defined by the Health Insurance Portability and Accountability Act (HIPAA), to the extent possible, the ULS will protect certain personally identifiable information (PII), which may include health care information.

As explained below, access is determined by the frequency and nature in which the PII appears in the material. This determination is made for each collection, series, or subseries to which this policy applies.

Level 1: Incidental Health Care Information

In the instance of Level 1 files, health care information of individuals is found sporadically in routine correspondence or other records. This health care information is not the primary focus of the documents, nor do all of the documents contain this information. In order to facilitate access to the fullest extent of records while also considering individual privacy, researchers will be required to consult with an archivist on the nature of this material and sign a Confidentiality Agreement to confirm that they will not record or otherwise publicize any health care information of subjects.

Level 2: Research and Sensitive Medical Information

In the instance of Level 2 files, the material consists primarily of personally identifiable information related to medical research. These materials include medical charts and files on individual patients, raw and compiled research data, case summaries, patient lists and demographics, doctor-patient correspondence, compassionate care Institutional Review Board protocols for specific individuals, audio-visual recordings, and other types of records ("Sensitive Medical Information").

Due to the sensitive nature of these documents, collections or subgroups of collections designated as Level 2 may be accessed for review only by qualified individuals with a specific, medical or historical research request. Researchers are required to complete the Request for Access to Restricted Material in Collections with Sensitive Medical Information Form. Petitions for access will be submitted to a privacy review committee consisting of the following ULS staff: Associate University Librarian for Archives & Special Collections, University Archivist, and Director of the Office of Scholarly Communications & Publishing. Researchers are encouraged to consult with Archives & Special Collections staff to determine which material may be of interest before submitting this form. Review of applications will be considered on a rolling basis. Forms must be submitted a minimum of 4 weeks prior to the anticipated start date of research.

Applications will be evaluated on the following criteria:

- Completeness of project proposal;
- Demonstrated necessity of the requested files for the completion of the project;
- Applicability of the requested files to the project proposal; and
- Demonstrated plan for responsible gathering, reproduction, deidentification for publication, and destruction of sensitive medical information.

Personally Identifiable Information Identifiers

Consistent with the 18 HIPAA identifiers, Archives & Special Collections consider the following personal information as sensitive medical information governed by Level 2 above:

- First and Last Names
- Geographic information smaller than a state
- Elements of dates, including birth and death dates, dates of hospital admission, and any ages greater than 89 years
- Telephone numbers
- Fax numbers
- Email addresses
- Social security numbers
- Medical record numbers
- Account numbers
- Certificate or license numbers
- Vehicle identifiers and serial numbers
- Device identifiers and serial numbers
- URLs
- IP addresses
- Biometric identifiers
- Full face photographic and comparable images
- Health plan beneficiary numbers
- Any unique identifying number or code that is not derived from another code, or identified by a code with unknown holder of the code key