



## **PROCEDURES FOR OBTAINING RECORDS AND MAINTAINING CONFIDENTIALITY AND DATA SECURITY**

### **Need for the Violent Death Reporting System**

The purposes for collecting and maintaining accurate and complete information about violent and intentional injuries (including all firearm injuries) are to assist in the development and evaluation of policies and strategies designed to reduce injuries and deaths. This surveillance system links information from at least three different sources (death certificates, medical examiner records, and law enforcement records) that provide a more complete picture of the circumstances surrounding the deaths than just using one data source alone. As a surveillance system, the NVDRS is used to inform and benefit planning for population health. This is not considered research, although researchers are allowed to request access to the de-identified national database for purposes of research if they follow certain guidelines established by the Centers for Disease Control & Prevention (CDC).

### **Authorization to operate the IA VDRS Program**

These sections of the Iowa Code provide Iowa Department of Public Health (IDPH) the legal authority to run the IAVDRS program:

- [Section 136.3](#) §2c – State Board of Health duties and responsibilities
- [Section 135.11](#) §1 – Duties of the department of public health
- [Section 135.40](#) – allows IDPH to collect data for purposes of reducing morbidity and mortality

### **Process for record collection**

**Death certificates.** The IDPH has a formal data agreement that describes the process for procurement of death certificate data and follows requirements established by statute and administrative rules to protect the data. The Office of Vital Statistics provides death certificate data every 60 days for individuals that are considered to have died a violent death<sup>1</sup> based on the cause of death code.

**Medical Examiner Records.** The IDPH has a formal data agreement in place with the Office of the State Medical Examiner, and the county medical examiners for Johnson and Polk counties. The agreements describe the process for obtaining medical examiner records (including the Medical Examiner 1 form, the autopsy report, and toxicology results) and follows requirements established by statute and administrative rules to protect the data. The program requests copies of the records on a routine basis, as names are obtained from death certificates.

**Law Enforcement Records.** Data from law enforcement investigations is obtained from information in the Iowa Incident Report, Supplemental Homicide Report and firearm trace records. This information is obtained in a manner that works best for the individual law enforcement (LE) agency. It may be collected through paper or electronic records, in-person or by telephone.

**HIPAA (Health Insurance Portability and Accountability Act).** HIPAA regulations apply directly to health-care providers including hospitals, clinics, paramedic and EMS programs, and

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<sup>1</sup> Violent deaths include homicides, suicides, undetermined manner, unintentional firearm-injury deaths, deaths resulting from law enforcement or legal intervention, and deaths resulting from terrorism.

most private health practitioners. There are exceptions in the HIPAA regulations that expressly authorize disclosure of health-related information for purposes of public health surveillance. Law enforcement, medical examiners, and other sources of data are not prohibited from contributing to NVDRS by HIPAA. Other sources of information that may be obtained for the IAVDRS include newspaper articles, hospital records or interviews with family members.

### **Personally-identified information and maintaining confidentiality**

Information received by the program from the primary data sources is personally-identifiable as the records will include individual names, DOB, DOD, county of residence and other demographic (racial/cultural, gender) information. Individual information will be obtained for injury victims, perpetrators and, depending upon the circumstances of the event, may include identification of relatives and acquaintances of injury victims and perpetrators. The data is recorded in the system in such a manner that individuals are necessarily identified both directly and through identifiers linked to the subject.

The only individuals who will have access to individual names and personally-identifiable information are the staff of the VDRS program. This includes the program manager, data abstractor, and evaluation consultant, as necessary. They are obligated to maintain the confidentiality of the records and assure it is not released improperly or re-disseminated. All staff and contractors working directly with the confidential records are required to sign a confidentiality agreement. The storage of electronic files at the state level that includes personally-identifiable information meets the security standards of the Office of the Chief Information Officer of the State of Iowa. Names of individual victims and suspects will never be released at the state level, and all data entered into the national database is de-identified.

### **De-identifying data into the surveillance system**

VDRS data is maintained in a secure, national database maintained by the CDC. Data that is entered into the national database **does not** include personally identifiable information such as names, addresses, and dates of birth. In the surveillance system, a unique identifier is assigned to each person that would not disclose any personal information but would allow the system to link individuals who may be associated with one case (such as a homicide-suicide or multiple casualties in one incident). The unique identifier is a 10-digit number comprised of this information:

- 1st letter of last name (1 digit)
- Individual's day of birth (2 digits)
- Last 4 digits of the death certificate number (4 digits)
- Last 4 digits of the medical examiner record (4 digits)

### **References**

1. "[National Violent Death Reporting System: Web Coding Manual, version 5.1](#)". CDC, National Center for Injury Prevention & Control, Division of Violence Prevention, June 2015.
2. "[National Violent Death Reporting System: Implementation Manual: A State's Guide to Starting and Operating a Violent Death Reporting System](#)". CDC, National Center for Injury Prevention & Control, Division of Violence Prevention, October 2014.