SFDPH Public Data Sharing Guidelines
Updated April 2022

It is the policy of the San Francisco Department of Public Health to comply with patient/client/resident rights regarding Protected Health Information (PHI) as set forth in the Health Insurance Portability and Accountability Act of 1996 (HIPAA). These guidelines exists to provide guidance only as it relates to the public release of data through the tracker webpages, so that public reporting of de-identified information of residents' health status, demographic and other characteristics, and geographical information reflect consistent reporting practices and meaningful differences in health outcomes, conditions that impact health, and delivery of services while safeguarding patient/client/resident rights regarding PHI.

DPH reserves the right to update these guidelines based on the department's discretion as needed while remaining in compliance with all federal, state and local laws.

Data can be released/published publicly in aggregate/summary form as long as it abides by the following:

A. **Numerator/Denominator Rules**

	County Level	Subcounty Level
Numerator	Must be 0 or ≥5	Must be 0 or ≥10
Denominator	Must be ≥1,000	Must be ≥1000

Data will be suppressed and/or displayed as <5 or <10 where the above County level conditions are not true.

B. **Stratification of 1 & 2 variables can be published if:**
   1) The data meets the Numerator/Denominator Rules in part A above

   Examples of Stratification of 1 & 2 variables included below:

	Example
1 Variable Stratification	Cumulative number of patients with specific disease Cumulative deaths by among patients with a specific disease
2 Variable Stratification	Disease status by race/ethnic Disease status by gender Disease status by age group

C. **Stratification of 3 or more variables can be published if:**
   1) The data meets the Numerator/Denominator Rule in part A above; AND
   2) The data, when evaluated against the DHCS Publication Scoring Criteria (below) receives a score of <12

Publication Scoring Criteria

Variable	Characteristics	Score
Events (Numerator)	1000+ events in a specified population	+2
	100-999 events	+3
	11-99 events	+5
	<11 events	+7
Sex	Male or Female	+1
Age Range	>10-year age range	+2
	6-10 year age range	+3
	3-5 year age range	+5
	1-2 year age range	+7
Race Group	White, Asian, Black or African American	+2
	White, Asian, Black or African American, American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, Mixed	+3
	Detailed Race	+4
Ethnicity	Hispanic or Latino - yes or no	+2
	Detailed ethnicity	+4
Race/Ethnicity Combined	This applies when race and ethnicity are collected in a single data field	
	White, Asian, Black or African American, Hispanic or Latino	+2
	White, Asian, Black or African American, Hispanic or Latino, American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander, Mixed	+3
	Detailed Race/Ethnicity	+4
Language Spoken	English, Spanish, Other Language	+2
	Detailed Language	+4
Time – Reporting Period	5 years aggregated	-5
	2-4 years aggregated	-3
	1 year (e.g., 2001)	0
	Bi-Annual	+3
	Quarterly	+4
	Monthly	+5
Residence Geography*	State or geography with population >2,000,000	-5
	Population 1,000,001 - 2,000,000	-3
	Population 560,001 - 1,000,000	-1
	Population 250,000 - 560,000	0
	Population 100,000 - 250,000	+1
	Population 50,001 - 100,000	+3
	Population 20,001 - 50,000	+4
	Population ≤ 20,000	+5
Service Geography*	State or geography with population >2,000,000	-5
	Population 1,000,001 - 2,000,000	-4
	Population 560,001 - 1,000,000	-3
	Population 250,000 - 560,000	-1
	Population of reporting region 20,001 - 250,000	0
	Population of reporting region ≤20,000	+1
	Address (Street and ZIP)	+3
Variable Interactions	Only Events (minimum of 5), Time, and Geography (Residence or Service)	-5
	Only Events (minimum of 3), Time, and Geography (Residence or Service)	-3
	Only Events (no minimum), Time, and Geography (Residence or Service)	0
	Events, Time, and Geography (Residence or Service) + 1 variable	+1
	Events, Time, and Geography (Residence or Service) + 2 variable	+2
	Events, Time, and Geography (Residence or Service) + 3 variable	+4

* If the geography of the reporting is based on the residence of the individual, use the "Residence Geography". If the geography of the reporting is based on the location of service, use the "Service Geography".

*The Publication Scoring Criteria above is from the California Department of Health Care Services, 2016 Data De-identification Guide (https://www.dhcs.ca.gov/dataandstats/Documents/DHCS-DDG-V2.1-010821%20%281%29.pdf)