

AHIMA Enterprise Biometric Information Privacy Policy (“Policy”)

PURPOSE

This Policy provides guidelines on how the American Health Information Management Association and its wholly-owned subsidiaries and affiliates (“AHIMA”) may collect, store or use an Examinee’s Biometric Data, through its third party testing center, to protect the security of examinations and to verify an Examinee’s identification.

SCOPE

This Policy applies to all AHIMA certification examinees (“Examinee(s)”), and is publicly available.

DEFINITIONS

As used in this Policy, Biometric Data includes an Examinee digital photograph, digital signature, and palm vein image. “Biometric Identifiers” and “Biometric Information” are defined as set forth in the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, *et seq.*:

“Biometric Identifier” means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric Identifiers do not include writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color. Biometric Identifiers do not include donated organs, tissues, or parts as defined in the Illinois Anatomical Gift Act or blood or serum stored on behalf of recipients or potential recipients of living or cadaveric transplants and obtained or stored by a federally designated organ procurement agency. Biometric Identifiers do not include biological materials regulated under the Genetic Information Privacy Act. Biometric Identifiers do not include information captured from a patient in a health care setting or information collected, used, or stored for health care treatment, payment, or operations under the federal Health Insurance Portability and Accountability Act (“HIPAA”) of 1996. Biometric Identifiers do not include an X-ray, roentgen process, computed tomography, MRI, PET scan, mammography, or other image or film of the human anatomy used to diagnose, prognose, or treat an illness or other medical condition or to further validate scientific testing or screening.

“Biometric Information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s Biometric Identifier used to identify an individual. Biometric Information does not include information derived from items or procedures excluded under the definition of Biometric Identifiers.

PROCEDURE

Before AHIMA obtains an Examinee’s Biometric Data from Pearson VUE, AHIMA will:

- a. Inform the Examinee in writing that AHIMA is obtaining the Examinee’s Biometric Data;
- b. Inform the Examinee in writing of the specific purpose and length of time for which the Examinee’s Biometric Data is being stored or used; and

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- c. Receive an electronically authorized informed consent from the Examinee authorizing AHIMA, through its third party testing center, to collect, store, and use the Examinee’s Biometric Data, for the specific purposes disclosed by this Policy.

AHIMA will not sell, lease, trade, or otherwise profit from an Examinee’s Biometric Data.

AHIMA will not disclose, re-disclose, or otherwise disseminate an Examinee’s Biometric Data unless:

- a. AHIMA obtains the Examinee’s electronically authorized informed consent to such disclosure, re-disclosure, or dissemination;
- b. Disclosure, re-disclosure, or dissemination completes a financial transaction requested or authorized by the Examinee or the Examinee’s legally authorized representative;
- c. Disclosure, re-disclosure, or dissemination is required by state or federal law or municipal ordinance; or
- d. Disclosure, re-disclosure, or disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

RETENTION SCHEDULE

AHIMA will permanently destroy such data when the **first** of the following occurs:

- The purpose(s) for collecting or obtaining such Biometric Data has been satisfied; or
- On the 5th year anniversary date of the Examinee’s last examination with Pearson VUE.

DATA STORAGE

AHIMA will use a reasonable standard of care to store, transmit, and protect from disclosure any Biometric Data it collects. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which AHIMA stores, transmits, and protects from disclosure other confidential and sensitive information, including personal information that can be used to uniquely identify an individual or an individual’s account or property, such as genetic markers, genetic testing information, account numbers, PINs, driver’s license numbers, and social security numbers.

AHIMA reserves the right to amend this Policy at any time.

Approval by:

Chief Executive Officer: 8/6/24

Legal and Privacy Officer: 8/6/24