

What Do We Mean by "For Statistical Purposes Only"?

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Abstract

Data subjects are often told their information will be used “for statistical purposes only,” but what does this actually mean? This paper will explore how the term “statistical purposes” has been used and defined in the U.S. federal statistical system. We analyze some of the inherent ambiguities of what may constitute a statistical or non-statistical purpose. Finally, we touch on how other national statistical organizations define the term and compare to what U.S. agencies are currently using...²

Keywords: Statistical Purpose, US Census Bureau, Ethics, Privacy, Confidentiality

1. Introduction

Messaging from many National Statistical Organizations (NSO), including the U.S. Census Bureau (Census Bureau), contains phrases such as “for statistical purposes only” or “for statistical uses only” to convey to the reader how information (e.g., data) can be used. No definition or explanation is typically presented to the reader leaving them to infer what is meant by these phrases. We are taking a closer look at this phrasing to promote discussion. Our review starts with the history of the implementation of “statistical purposes only” by looking at applicable laws and how they helped shape the current use of the phrase. We also examine the approaches from other national statistical organizations (NSOs) and interpretations we have found.

For the Census Bureau, the phrase “statistical purposes only” is embedded within most, if not all, of our program communications. Research has shown, however, that use of this term, without a formal definition being provided, may hurt rather than help convince data subjects that their information will be properly safeguarded. Landreth, Gerber, and DeMaio (2008) note:

“Messaging about “confidentiality,” “statistical purposes,” and linkage to administrative records is often misunderstood, or seen as vague or open-ended.

Messaging about legal protections and penalties for unauthorized disclosure was variously interpreted as “legalese,” the “fine print,” or “over the top.”

The lack of stated definition or understanding of the uses of their data may discourage stakeholder’s engagement with our data collection efforts or statistical products, ultimately

² Any opinions and conclusions expressed herein are those of the author(s) and do not reflect the views of the U.S. Census Bureau.

affecting our effectiveness in completing our mission. This issue has motivated us to review what is meant by “for statistical purposes only.”

2. What is “For Statistical Purposes Only” for the Census Bureau

Within the history of the U.S., we can find motivations for the use of the phrase “statistical purposes only.” The meaning of this phrase has evolved over time and largely tracks important privacy and confidentiality-related events in the U.S., as outlined in “A History of Census Privacy Protections,” (US Census, 2019) and discussed within “A Monograph on Confidentiality and Privacy in the U.S. Census” (US Census, 2001). These documents discuss the events leading up to current laws governing the information collected and provided by the Census Bureau and as a result they have molded the current U.S. definition of statistical purpose.

Across the U.S. federal statistical system, we collect information through censuses, surveys, and administrative records to produce statistical products that serve a broader “public benefit”. The Census Bureau’s decennial census of population and housing, for example, is used to apportion of seats in the U.S. House of Representatives, draw legislative and voting district boundaries, and allocate over \$1 trillion in federal funds annually. Over time, the informational needs of the U.S. government and overall societal demand for statistical products have both grown considerably. Some of the motivations for the explosive growth in demand for statistics as a public benefit include: providing social and economic services to the public, measuring how effective social programs are in meeting community needs, and measuring the growth and needs of the economy. Our discussion of the meaning and interpretation of the phrase “for statistical purposes only” starts with, but goes well beyond, this central premise of official statistics intended as a public benefit. Some may interpret “public benefit” as referring to a “public good” in the formal sense of the term used in economics and public policy (Reiss, 2021), but this interpretation is out scope for this paper. We want to be clear that a public benefit is not necessarily a tangible product and rather we use the term loosely here for example a national park is a public benefit.

In fact, examination of the early language used in Census Bureau communications prior to 1940³ reveals that the intent of the phrase extended beyond a mere commitment to producing a public benefit, and often it included:

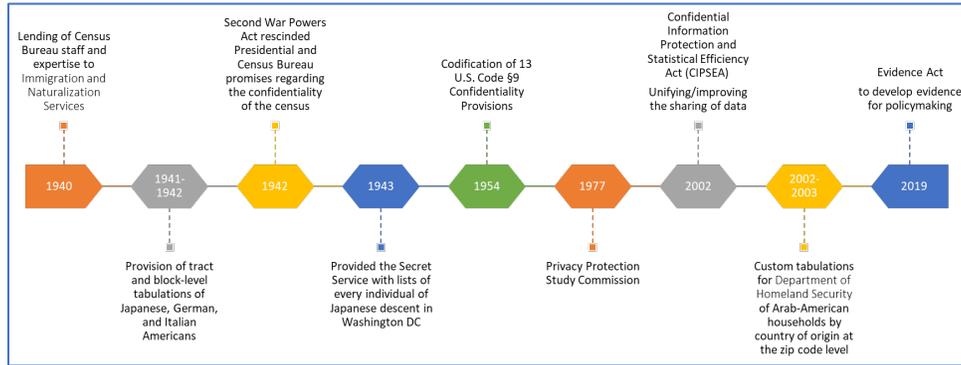
- the discretion of the Director of the Census Bureau.
- an acknowledgement of not identifying responding individuals or companies.
- an acknowledgement that individual information will only be shared with persons working with the data for the statistical purposes for which the data was collected.

³ For our review of Census’ early language see Appendix A.

- information is not to be used to the detriment of the person or persons whom the information relates.

Beginning in the 1940s, new laws and historical events began to shape contemporary understanding of the phrase, (see Figure 1).

Figure 1 Historical timeline of events and laws contributing to the modern interpretation of Statistical Purpose in the United States from 1940 to present.



We see the Census Bureau struggle to deal with the requests being made of them from government entities during war time. By 1942, the promises of confidentiality made by the U.S. President and the Census Bureau for the 1940 Census were legislatively rescinded under the Second War Powers Act. These events challenged the public trust and understanding of promises made by government officials regarding the collection of information for statistical purposes only.

In the late 40s most of the Second War Powers Act was repealed, returning the confidentiality guarantee of the decennial census. It wasn't until 1954 that codification of Title 13 solidified these census confidentiality protections into law. In this codification we see the phrase "for statistical purposes only" as part of these protections, but the term remained undefined (See Table 1).⁴ We do note, however, that the wording contained in Title 13 still referred to the discretion of the Director.

Judicial cases between 1958 and 1962 further clarified the scope of these confidentiality protections, particularly in the context of business information. There were also amendments made to Title 13 to extend the confidentiality protection to file copies and copies of records and reports retained by businesses (U.S. Census, 2002).

The 1970s saw a new federal focus on privacy rights and protections with the passage of the Privacy Act of 1974 and the statutory curtailment of the "Census Directors' Discretion to release

⁴ Prior to the 1954 Codification of Title 13 the confidentiality and privacy protections existed through various policy decisions and Acts of Congress.

census data on individuals to governors, courts, and individuals” (U.S. Census, 2002), narrowing and clarifying the implied interpretation of statistical purpose. In addition, the Privacy Protection Study Commission of 1977 introduced the concept of Functional Separation within the context of the federal statistical system. In doing so, the commission’s report uses the term “research or statistical purpose.” Specifically, their definition of functional separation entails “separating the use of information about an individual for a research or statistical purpose from its use in arriving at an administrative or other decision about that individual” (U.S. Privacy Protection Study Commission, 1977). From this we conclude that a statistical purpose may not extend to use of the information for an adverse administrative or other decision about the individual, thereby narrowing the definition.

The rise of the Internet and increasing data accessibility brought about different types of privacy and data protection challenges. In 2002 this included the passage of the E-Government Act and the Confidential Information Protection Statistical Efficiency Act (CIPSEA). Within CIPSEA, the phrases “nonstatistical purpose” and “statistical purpose” at last receive statutory definitions (See Table 1). These definitions include many of the previously inferred notions of privacy, confidentiality, and disclosure limitations that we have seen in previous policy and legislation.

In the aftermath of the events of September 11, 2001, the Census Bureau responded to a request from the Department of Homeland Security to create custom tabulations of de-identified statistics about Arab-Americans:

“The tabulations were produced in August 2002 and December 2003 in response to requests from what is now the Customs and Border Protection division of the Department of Homeland Security. One set listed cities with more than 1,000 Arab-Americans. The second, far more detailed, provided ZIP-code-level breakdowns of Arab-American populations, sorted by country of origin. The categories provided were Egyptian, Iraqi, Jordanian, Lebanese, Moroccan, Palestinian, Syrian and two general categories, “Arab/Arabic” and “Other Arab.” – (Clemetson, 2004)

This is an example in our most recent history of an application of statistical purpose functioning lawfully but perhaps not as expected by the public. The Census Bureau did comply with that government request but within the limitations set forth by the definitions of statistical purpose, privacy, and confidentiality.

Lastly, we mention the Commission on Evidence Based Policymaking and the Foundations for Evidence-Based Policymaking Act 2018 which “requires agency data to be accessible and requires agencies to plan to develop statistical evidence to support policymaking.” This act expands efficiencies in government by amending CIPSEA to ensure the best information informs the policy making process. The definition of evidence within the statute includes statistical purpose (See Title 44 on Table 1). Statistical products will continue to be produced and ensures

that new statistical products can be shared with both policy makers and the public using the same confidentiality and use restrictions. In addition, the added requirements of timeliness, credibility, accuracy, and objectivity to be used in defining these products and their purpose expands the intended meaning of statistical purposes only.

From review of our policy, history, and product development we can see ongoing themes relating to confidentiality, privacy, disclosure, efficiency, credibility, accuracy, and objectivity and how these associations inform changes to our statistical purpose definition over time. This includes the narrowing and expansion of what falls under statistical purpose through results of legal interpretation and legislation implementation.

Legal definitions of “statistical purposes,” such as in CIPSEA focus on permissible uses of statistical data, such as uses that describe or estimate the characteristics of groups without revealing or identifying the data subjects that belong to those groups. As such, this restriction on permissible uses is a central component of the interpretation of the definition. However, embedded within that definition, and in the broader context in which it is typically used, is another dimension of restrictions: limits on who can access the identifiable information about data subjects that are the necessary precursors to the production of the statistics. These two dimensions are intended to work in tandem to help reassure data subjects that they will not be adversely impacted by participating in a survey: the data can only be used to produce statistics about groups, and they can only be accessed by the individuals who will be producing those statistics. Taken together, the use restrictions and access restrictions inherent to the concept of statistical purposes are intended to help insulate the production of official statistics from the broader administrative and enforcement activities of government—an example of functional separation.

3. A Demonstration of Statistical Purpose Through Statistical Product Development

What “is,” “is not,” and “may be” a statistical purpose can be illustrated by the following examples. The authorizing statutes for statistical offices often mandate that they produce and publish specific statistical products. The collection of these mandated statistical products establishes a baseline for what can be considered a statistical purpose. For example, Article 1 Section 2 of U.S. Constitution requires a decennial census for the purpose of apportioning representatives to the U.S. House of Representatives. Currently, the Census Bureau conducts more than 130 surveys and programs each year to meet various statistical product mandates.

- *Population counts such as the Decennial Census provide a statistic useful for apportionment while preserving the anonymity of the respondents.*

- *The American Community Survey was developed to help understand the changing shape of the nation and its communities.*
- *Principal Economic Indicators are used to understand and improve the economy.*
- *Sector Specific statistics are used to measure important aspects of society and support policy making research.*

As for what would not be considered a statistical purpose, the Census Bureau’s activities during the second world war provide a clear illustration:

- *In 1943, the U.S. Census Bureau provided names and addresses of individuals of Japanese ancestry to the War Department, not just aggregated data, as they had long claimed. While useful for the War Department this is now illegal and moved the tipping point for acceptable utility and the boundaries for what is a statistical purpose.*

In between these extremes, there can be uncertainty as to whether a particular activity should be considered a permissible, statistical purpose. The Census Bureau’s 2002-2003 special tabulations on Arab-Americans for the Department of Homeland Security provide one such ambiguous example. The tabulations only contained information that was already publicly available and did not violate the confidentiality of individual data subjects’ records. Similarly, no individual’s record was used in an administrative or law enforcement action to the harm of that individual. But the collective, non-identifiable records of a group were being used to target administrative and law enforcement action that could harm members of that group. While there is no question that producing the statistics was legal, subsequent criticism regarding the appropriateness of the actions would suggest that production of those statistics should perhaps not be considered a statistical purpose in the true spirit of the term.

4. Definitions and Use Statistical Purpose Abroad

We have been looking for comparative examples of the use of the phrase “for statistical purposes only” within messaging provided by national statistical organizations (NSO). In our review we have found examples for phrases and definitions and identify them in Table 1 (See Appendix B). We recognize this may not be a non-exhaustive list of NSOs and definitions.

Table 1 Uses and Definitions of Statistical Purpose, Statistical Use or other terms from NSOs

NSO	Definition/Usage of Statistical Purpose or Statistical Use
Australia	Use Restrictions (Purpose): Statistical Purposes Access Restrictions (Confidentiality): Additional Commentary: Main Privacy URL: https://www.abs.gov.au/about/legislation-and-policy/privacy
Eurostat	Use Restrictions (Purpose): Statistical Purpose (D) Access Restrictions (Confidentiality): Additional Commentary: ‘use for statistical purposes ’ means the exclusive use for the development and production of statistical results and analyses” (EPCEU, 2009)
New Zealand	Use Restrictions (Purpose): For Official Statistics (43) In Public Interest (49) Access Restrictions (Confidentiality): Do not publish data that could identify an individual or organization 39(1) Confidentiality (51) Additional Commentary:

NSO	Definition/Usage of Statistical Purpose or Statistical Use
	<p>Official statistics may be produced on any matter relating to New Zealand including, without limitation, its economic, social, cultural, and environmental situation (Section 43). Statistician must be satisfied research is in the public interest and account for the public benefit, contribution to the well-being of the Maori, and any risks of harm (Section 49).</p> <p>39(2)g Allows for prosecution</p> <p>51. Privacy Protection (Statistics New Zealand, 2022)</p>
OECD	<p>Use Restrictions (Purpose): Statistical Purposes</p> <p>Access Restrictions (Confidentiality): Strictly Confidential</p> <p>Additional Commentary:</p> <p>Individual data collected by the OECD for statistical compilation are considered to be strictly confidential and used exclusively for statistical purposes. Specific measures are taken to ensure the full protection of confidential data from any potential disclosure. (OECD, 2012)</p>
Statistics Canada	<p>Use Restrictions (Purpose): Appropriate Use, Statistical Purpose (D)</p> <p>Access Restrictions (Confidentiality): Confidentiality Statement use of Statistical Purpose</p> <p>Additional Commentary:</p> <p>"Information collected by Statistics Canada is for statistical purposes, defined as description or analysis of characteristics of a population to which the individual belongs " (Stats Canada, 2017)</p>
United Kingdom Office of National Statistics	<p>Use Restrictions (Purpose): Public interest, scientific or historical research or statistical purposes</p> <p>Access Restrictions (Confidentiality):</p> <p>Additional Commentary:</p> <p>The Data Protection Act 2018 (https://www.legislation.gov.uk/ukpga/2018/12/section/19)</p> <p>"Processing is necessary for archiving in the public interest, scientific or historical research purposes or statistical purposes based on UK law."</p> <p>"The ONS has the statutory objective to promote and safeguard the production of official statistics that serve the public good. This means that any personal data we collect, whether it is for our own use or on behalf of someone else, will only ever be used to produce statistics or undertake statistical research. In order for us to produce statistics and enable research we may link the data that we collect with other data that we hold. (UKONS, 2023)</p>
UN Statistics Division	<p>Use Restrictions (Purpose): Statistical Purposes</p> <p>Access Restrictions (Confidentiality): Strictly Confidential</p> <p>Additional Commentary:</p> <p>Statistical purpose: tasks aimed at developing, producing, and disseminating official statistics, including experimenting and testing. (UNSD, 2019)</p>
U.S Census Bureau, Title 13	<p>Use Restrictions (Purpose): Statistical Purpose, immune from legal process</p> <p>Access Restrictions (Confidentiality): Do not identify respondents</p> <p>Additional Commentary:</p> <p>Title 13 §9. https://uscode.house.gov/</p> <p>Information as confidential; exception</p> <p>(a) Neither the Secretary, nor any other officer or employee of the Department of Commerce or bureau or agency thereof, or local government census liaison, may, except as provided in section 8 or 16 or chapter 10 of this title—</p> <p>(1) use the information furnished under the provisions of this title for any purpose other than the statistical purposes for which it is supplied; or</p> <p>(2) make any publication whereby the data furnished by any particular establishment or individual under this title can be identified; or</p> <p>(3) permit anyone other than the sworn officers and employees of the Department or bureau or agency thereof to examine the individual reports...."</p>
U.S. Federal Statistical System, Title 44 (CIPSEA)	<p>Use Restrictions (Purpose): Statistical Purpose (D)</p> <p>Access Restrictions (Confidentiality): Do not identify respondents</p> <p>Additional Commentary:</p> <p>Title 44 USCA § 3561 https://uscode.house.gov/</p> <p>(12) Statistical purpose--The term "statistical purpose"--</p> <p>(A) means the description, estimation, or analysis of the characteristics of groups, without identifying the individuals or organizations that comprise such groups; and</p> <p>(B) includes the development, implementation, or maintenance of methods, technical or administrative procedures, or information resources that support the purposes described in subparagraph (A).</p> <p>(8) Nonstatistical purpose--The term "nonstatistical purpose"--</p> <p>(A) means the use of data in identifiable form for any purpose that is not a statistical purpose, including any administrative, regulatory, law enforcement, adjudicatory, or other purpose that affects the rights, privileges, or benefits of a particular identifiable respondent; and</p>

NSO	Definition/Usage of Statistical Purpose or Statistical Use
	<p>(B) includes the disclosure under section 552 of title 5 of data that are acquired for exclusively statistical purposes under a pledge of confidentiality.</p> <p><i>44 section 3561(6)</i></p> <p><i>Evidence.— The term “evidence” means information produced as a result of statistical activities conducted for a statistical purpose.</i></p> <p><i>Section 302: “Each statistical agency or unit shall (1) produce and disseminate relevant and timely statistical information; (2) conduct credible, accurate, and objective statistical activities; and (3) protect the trust of information providers by ensuring the confidentiality and exclusive statistical use of their responses.”</i></p>
<p>U.S. Internal Revenue Service, Title 26</p>	<p>Use Restrictions (Purpose): Statistical Use</p> <p>Access Restrictions (Confidentiality):</p> <p>Additional Commentary:</p> <p>26 USCA § 6103 https://uscode.house.gov/</p> <p>(j) Statistical use</p> <p>(1) Department of Commerce</p> <p>Upon request in writing by the Secretary of Commerce, the Secretary shall furnish-</p> <p>(A) such returns, or return information reflected thereon, to officers and employees of the Bureau of the Census, and</p> <p>(B) such return information reflected on returns of corporations to officers and employees of the Bureau of Economic Analysis,</p> <p>as the Secretary may prescribe by regulation for the purpose of, but only to the extent necessary in, the structuring of censuses and national economic accounts and conducting related statistical activities authorized by law.</p>

5. Considerations

In our review, we have found many interpretations of the meaning behind the phrase “for statistical purposes only” and offer a summary here to promote further discussion:

- Official statistics are a public benefit, as such, they need to be efficient, credible, accurate, timely, and objective.
- Access to data subjects’ identifiable information is restricted to statistical agency employees (and agents) with a work-related “need to know.”
- Statistical safeguards are used to protect the confidentiality of data subjects’ information in publicly released statistical products. A data subject’s information is not to be used in a manner that causes them direct harm, for example, as part of a law enforcement proceeding or administrative benefit determination.

These interpretations might be what the public infers, but we can’t say for sure. We acknowledge the power of simplicity found in the definitions of other NSO’s and note the same concepts can be found in those definitions. A lingering question that we have in our review is: “Do these interpretations and definitions that we have found allow NSOs to move forward utilizing the more recent developments in statistics and data science?” Some areas we are concerned with include whether there should also be protections against statistics being used in a manner that could directly harm a group (rather than an individual), and the distributional impacts of providing a “public benefit” of statistics affecting some segments of society more than others. There’s a lot for us to consider moving forward and we welcome reactions and ideas.

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7. References

- European Commission, Eurostat, (2023). *Statistical requirements compendium: 2023 edition*, Publications Office of the European Union. <https://data.europa.eu/doi/10.2785/562159>.
- European Parliament and the Council of the European Union, (2009). *REGULATION (EC) No 223/2009 of 11 March 2009*. <http://data.europa.eu/eli/reg/2009/223/2015-06-08> . Accessed on March 2024.
- Landredth, A., Gerber, E., & Demaio, T. (2017). *Report of Cognitive Testing of Privacy- and Confidentiality-Related Statements in Respondent Materials for the 2010 Decennial: Results from Cognitive Interview Pretesting with Volunteer Respondents*. <https://www.census.gov/content/dam/Census/library/working-papers/2008/adrm/rsm2008-04.pdf>. (Accessed March 2024)
- Clemetson, L.(2004, July 30). Homeland Security Given Data on Arab-Americans. New York Times. <https://www.nytimes.com/2004/07/30/us/homeland-security-given-data-on-arab-americans.html>. (Accessed March 2024)
- Organization for Economic Co-operation and Development. (2012, January 17). Quality Framework and Guidelines for OECD Statistical Activities. [https://one.oecd.org/document/std/qfs\(2011\)1/en/pdf](https://one.oecd.org/document/std/qfs(2011)1/en/pdf). (Accessed March 2024)
- Reiss, Julian, "Public Goods", The Stanford Encyclopedia of Philosophy (Fall 2021 Edition), Edward N. Zalta (ed.), <https://plato.stanford.edu/archives/fall2021/entries/public-goods/>. Accessed May 2024.
- Statistics Canada. (2017). Statistics Canada Quality Assurance Framework. (Catalogue no. 12-586-X Third Edition). <https://www150.statcan.gc.ca/n1/en/pub/12-586-x/12-586-x2017001-eng.pdf?st=9tr3nuNz>. Accessed May 22,2023.
- United Kingdom Office of National Statistics. (2023, September 7). Data Protection: Privacy Information. <https://www.ons.gov.uk/aboutus/transparencyandgovernance/dataprotection>. Accessed March 2024.
- United Nations Statistics Division. (2019, May). United Nations National Quality Assurance Frameworks Manual for Official Statistics. https://unstats.un.org/unsd/dnss/docs-nqaf/UN_NQAF_Manual_Unedited_manuscript_of_3_May_2019.pdf. Accessed March 2024.
- U.S. Census Bureau. (2001). A Monograph on Confidentiality and Privacy in the U.S. Census. <https://www.census.gov/history/pdf/ConfidentialityMonograph.pdf>. Accessed March 2024.
- U.S. Census Bureau. (2002). *Events in the Chronological Development of Privacy and Confidentiality at the U.S. Census Bureau*. <https://www.census.gov/history/pdf/PrivConfidChrono.pdf>. Accessed March 2024.
- U.S. Census Bureau. (2019, October). *A History of Census Privacy Protections*. . Accessed March 2024.
- U.S. Privacy Protection Study Commission(1977, July 12). *Personal Privacy in an Information Society: The Report of the Privacy Protection Study Commission*. <https://archive.epic.org/privacy/ppsc1977report/c1.htm> . Accessed March 2024.
- U.S. Evidence Based Policy Commission (2016, July). *Commission on Evidence Based Policymaking*. https://obamawhitehouse.archives.gov/omb/management/commission_evidence . Accessed March 2024.
- U.S. Evidence Based Policy Commission(2016b , July). *Using Administrative and Survey Data to Build Evidence*. https://obamawhitehouse.archives.gov/sites/default/files/omb/mgmt-gpra/using_administrative_and_survey_data_to_build_evidence_0.pdf . Accessed April 2024.

Appendix A

Phrases similar to “For Statistical Purposes Only” were introduced into language within public policy, and speeches from government leaders. Previous incarnations of similar phrases include:

- *“...discretion of the Director of the Census” in 1902*
- *“Proper Purposes” in 1909*
- *“... sole purpose ... to secure general statistical information... No person can be harmed in any way ... every employee of the Census Bureau is prohibited, under heavy penalty, from disclosing information which may thus come to his knowledge...” -Presidential Proclamation 1910*

The Census goes through many iterations of the language used to communicate the components of statistical purpose within policies, proclamations and acts of congress before it arrives at the phrase “for statistical purposes only.”

- *“ Individual responses to the census “Shall be used only for the statistical purposes for which [they are] supplied... nor shall the Director of the Census permit anyone other than the sworn employees of the Census Office to examine the individual reports.... Provided that in no case shall the information furnished under the authority of this Act be used to the detriment of the person or persons to whom such information relates” Fourteenth Decennial Census Act*

In 1929 under the Fifteenth Decennial Census Act, we see the first incarnation of the language used in what we know today as Title 13 of the US Code which includes the phrase to describe the informational uses of the data being collected “for the statistical purposes for which they are supplied” but it lacks the definition we are looking for.

- *Responses to the census “shall be used only for the statistical purposes for which [they are] supplied.” The bureau will not publish any data that would allow the identification of responding individuals or companies.” ... nor shall the Director of the Census permit anyone other than the sworn employees of the Census office to examine the individual reports...The Director is authorized ... at his discretion to furnish copies... Provided, however, that in no case shall information furnished under the authority of this act be used to the detriment of the person or persons whom such information relates”*

Appendix B

FERPA	Use Restrictions (Purpose): Access Restrictions (Confidentiality): Additional Commentary: 20 U.S.C. § 1232g; https://uscode.house.gov/
HIPPA	Use Restrictions (Purpose): Access Restrictions (Confidentiality): Do not identify individuals Additional Commentary: https://www.hhs.gov/sites/default/files/ocr/privacy/hipaa/administrative/combined/hipaa-simplification-201303.pdf 164.502 Uses and disclosures of protected health information.