

# HIPAA FACT SHEET

## De-identified Health Information

The Privacy Rule of the Health Insurance Portability and Accountability Act of 1996 contains in Section 164.514 a “safe harbor” provision. This provision states that if the following 18 “identifiers are removed from the data it is “de-identified” i.e. anonymous and the HIPAA provisions do not apply. To be de-identified the health information should not contain any of the following elements:

1. Names
2. All geographic subdivisions smaller than State, including street address, city, county, precinct, zip code, and their equivalent geocodes, except for the initial three digits of a zip code if, according to the Bureau of Census: i) the geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and ii) the initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000.
3. All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, date of death; all ages over 89 and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older.
4. Telephone numbers
5. Fax numbers
6. Electronic mail addresses
7. Social security numbers
8. Medical record numbers
9. Health plan beneficiary numbers
10. Account numbers
11. Certificate/license numbers
12. Vehicle identifiers and serial numbers, including license plate numbers.
13. Device identifiers and serial numbers
14. Web URLs
15. Internet protocol addresses
16. Biometric identifiers including finger and voice prints
17. Full face photos and comparable images
18. Any unique identifying number, characteristic or code