

Informational Supplement A.

LIST OF IDENTIFYING INFORMATION

As per HIPAA regulations, the following identifiers of the individual or of relatives, employers, or household members of the individual must be removed to achieve the "safe harbor" method of de-identification:

1. Names
2. All geographic subdivisions smaller than a State, including street address, city, county, precinct, zip code, and their equivalent geocodes,
3. All elements of dates (except year) for dates directly related to the individual, including birth date, admission date, discharge date, date of death.
(Also: All ages over 89 and all elements of dates indicative of such age must be eliminated, except that such ages 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 Universal Resource Locators (URLs)
15. Internet Protocol (IP) address numbers; (P) Biometric identifiers, including finger and voice prints
16. Full face photographic images and any comparable images; and ® any other unique identifying number, characteristic, or code, except as permitted for re-identification purposes provided certain conditions are met.
17. In addition to the removal of the above-stated identifiers, the covered entity may not have actual knowledge that the remaining information could be used alone or in combination with any other information to identify an individual who is subject of the information.

45 C.F.R. § 164.514(b).

<https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>