

De-Identifying Data According to the HIPAA Safe Harbor Standard

Data or narratives published in *NIB* should eliminate all of the following information:

1. Names. (You may use fictitious names if this facilitates writing.)
2. All geographic subdivisions smaller than a state, including street address, city, county, precinct, ZIP Code, and their equivalent geographical codes.
3. All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, date of death; and 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. Facsimile 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.
16. Biometric identifiers, including fingerprints and voiceprints.
17. Full-face photographic images and any comparable images.
18. Any other unique identifying number, characteristic, or code, unless otherwise permitted by the Privacy Rule for re-identification.

Example:

Acceptable: “In 2001, a 30-year old Latina woman gave birth to a son with Down’s Syndrome in a community hospital. We will call the mother Maria and the baby Roberto.”

Not acceptable: “On July 23, 2001, a 30-year old Latina woman gave birth to a son with Down’s Syndrome at Memorial Hospital in Houston, TX. Her name was Laetitia and her son was Antonio.” [Note: This example is fictitious.]