HIPAA PHI: List of Identifiers



- 1. Names
- 2. All geographical subdivisions smaller than a 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 current publicly available data from the Bureau of the Census:

- (a) The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and
- (b) The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people are 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; 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. Phone 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
- 16. Biometric identifiers, including finger and voice prints
- 17. Full face photographic images and any comparable images
- 18. Any other unique identifying number, characteristic, or code (note this does not mean the unique code assigned by the investigator to code the data)

There are also additional standards and criteria to guard against re-identification. Codes used to replace the identifiers in datasets cannot be derived from information related to individuals or master codes, nor can the method to derive the codes be disclosed. For example, a subject's initials cannot be used to code associated data. Additionally, researchers must not have knowledge that the research subject could be re-identified from the remaining identifiers in the PHI. In other words, the information would still be considered identifiable if there were a way to identify the individual, even though all of the 18 identifiers were removed.