UAMS

De-Identification Chart

START HERE

Did data ever include patient/subject identifiers?

No → Not covered under HIPAA. Check other applicable regulations.

Yes → Does data use require an ability to re-identify individual patients?

Yes → Create key or code for re-identification of patient's record.

No → Remove all names pertaining to patient.

Remove all geographic subdivisions smaller than a State.

Combine zip codes with the same initial 3 digits. → Bundle zips as "000" when previous bundle nets less than 20,000 population.

Do data have dates directly related to the individual?

Yes → Any age greater than 89 becomes age = 90. → Remove all elements of date (except year), directly relating to individual (birth, admission, discharge, death, etc)

No →

FOR INDIVIDUALS, EMPLOYERS, RELATIVES OR HOUSEHOLD MEMBERS REMOVE ALL:

Telephone Numbers
Fax Numbers
E-mail Addresses
Social Security Numbers
Health Plan & Beneficiary Numbers
Medical Record Numbers
Account Numbers
Certificate & License Numbers
Vehicle Identifiers Including License Plate
Web URLs
Internet IP Addresses
Device Identifiers & Serial Numbers
Biometric Identifiers Including Finger/Voice Prints
Full Face Photos & Comparable Images

Remove any/all other unique identifying characteristics.

Covered Entity has no knowledge that the information could be used alone or in combination with other information to identify the individual.

Yes → **De-Identification Standard Met**