

UNIVERSITY OF FLORIDA
INFORMATION PRIVACY POLICIES & PROCEDURES
HEALTH INFORMATION OPERATIONAL GUIDELINES

I. De-identification of Protected Health Information

A. POLICY

03/28/2003

1. **Health information that does not identify a patient**, and for which there is no reasonable basis to believe that the information can be used to identify a patient, is not individually identifiable health information.

B. DEFINITIONS

1. **Individually Identifiable Health Information** is any health information about a patient that relates to the patient's past, present, or future physical or mental health, the provision of health care, or the payment for health care, and identifies the patient or could reasonably be expected to identify the patient. (See the Glossary for full definition.)

C. PRIVACY REQUIREMENTS

1. **Health information is not individually identifiable health information only if:**
 - a) *All the following identifiers concerning the patient, relatives, employers, and household members, are removed:*
 - (1) Names;
 - (2) All geographic subdivisions smaller than a State, including street address, city, county, precinct, zip code, and their equivalent geo-codes, except for the initial three digits of a zip code;
 - (3) All elements of dates (except year) for dates directly related to a patient, 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) Fax numbers;
 - (6) Electronic mail addresses;
 - (7) Social security numbers;
 - (8) Health 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; and

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- (18) Any other unique identifying number, characteristic, or code, except as permitted in 2. (Re-identification), following; and*
- b) The covered entity does not have actual knowledge that the information could be used alone or in combination with other information to identify a patient who is a subject of the information; or*
 - c) Statistical Analysis shows that the risk of identifying an individual person with the information is acceptably low.*
- 2. Re-identification:** A code or other means of record identification may be assigned to allow information to be re-identified, provided that:
- a) The code or other means of record identification is not derived from or related to information about the individual and is not otherwise capable of being translated so as to identify the individual; and*
 - b) The covered entity does not use or disclose the code or other means of record identification for any other purpose, and does not disclose the mechanism for re-identification.*

D. REFERENCES

- 1. HIPAA:** 45 CFR §164.514 (a) (De-identification of Protected Health Information)

E. EXHIBITS: None