

HIPAA "Safe Harbor" De-Identification of Medical Record Information requires that each of the following identifiers of the individual or of relatives, employers, or household members of the individual must be removed from medical record information in order for the records to be considered de-identified:

1. Names
2. All geographic subdivisions smaller than a State, including street address, city, county, precinct, zip code, and their equivalent geocodes, except for the initial 3 digits of a zip code if, according to the currently publicly available data from the Bureau of Census:
 - a. The geographic unit formed by combining all zip codes with the same 3 initial digits contains more than 20,000 people; and
 - b. The initial 3 digits of a zip code for all such geographic units containing 20,000 or fewer people is changes 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. 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 Certificate/license numbers
11. Vehicle identifiers and serial numbers; license plate numbers
12. Device identifiers and serial numbers
13. Web Universal Resource Locators (URLs)
14. Internet Protocol (IP) address numbers
15. Biometric identifiers
16. Full face photographic images and any comparable images
17. Any other unique identifying number, characteristic, or code, except a code to permit re-identification of the de-identified data by the Honest Broker.

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