

Protected Health Information (PHI)

PHI, as defined by HIPAA (US & Puerto Rico only)

List of 18 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: (1) The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and (2) The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is 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; and*
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 protect individual's privacy from re-identification. Any code used to replace the identifiers in datasets cannot be derived from any information related to the individual and the master codes, nor can the method to derive the codes be disclosed. For example, the unique code cannot include the last four digits (in sequence) of the Social Security number. Additionally, the researcher must not have actual knowledge that the research subject could be re-identified from the remaining identifiers in the PHI used in the research study. In other words, the information would still be considered identifiable if there was a way to identify the individual even though all of the 18 identifiers were removed.

PHI, as defined by PIPEDA (Canada only)

Personal health information is defined in section 4 as: “identifying information about an individual in oral or recorded form, if the information:

(a) relates to the physical or mental health of the individual, including information that consists of the medical history of the individual’s family;

(b) relates to the providing of health care to the individual;

(c) is a plan of service within the meaning of the Long-Term Care Act, 1994 for the individual;

(d) relates to payments or eligibility for health care in respect of the individual;

(e) relates to the donation by the individual of any body part or bodily substance of the individual or is derived from the testing or examination of any such body part or bodily substance;

(f) is the individual’s health number, or

(g) identifies a provider of health care to the individual or a substitute decision-maker of the individual.”