HIPAA/PHI IDENTIFIERS

When developing research protocols, the Investigator must take into consideration allowable use and disclosure of PHI under HIPAA. The following identifiers are considered links to a particular individual or data that could enable individual identification:

1. Names;
2. Geographic 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;
3. All elements of dates (except year) for dates directly related to an individual (*e.g.,* date of birth, admission);
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;
11. Certificate/license numbers;
12. Vehicle identifiers and serial numbers, including license plate numbers;
13. Device identifiers and serial numbers;
14. Web universal locators (URL's);
15. Internet protocol (IP) address numbers;
16. Biometric identifiers, including finger and voiceprints;
17. Full-face photographic image and any comparable images; and
18. Any other unique identifying number, characteristic, or code.