

**DAI Policy 500.50.10 – Authorized Disclosure of Protected Health Information (PHI) Without
Inmate Patient Authorization
Attachment C – De-Identification of PHI
Effective Date: 08/25/14**

De-identified health care information is not individually identifiable and can be disclosed without authorization of the patient under one of the two following circumstances:

1. No reasonable basis exists to believe that the information can be used to identify a patient or relatives, employers or household members of the patient AND the following identifiers have been removed:
 - a. Names
 - b. Geographic subdivisions smaller than a state (e.g. city, county) except for the first 3 numbers of a zip code that could be used to identify the geographic location of the patient.. See 45 C.F.R.164.514 (b)(2)(i) for additional guidance
 - c. All dates except the year that directly relates to an individual including:
 - i. Date of Birth
 - ii. Admission Date
 - iii. Discharge date
 - iv. Date of death
 - v. Ages over 89: See 45 C.F.R.164.514 (b)(2)(i)(C) for additional guidance
 - d. Telephone numbers
 - e. Fax numbers
 - f. Electronic mail addresses
 - g. SSN
 - h. Medical record numbers
 - i. Health plan beneficiary numbers
 - j. Account numbers
 - k. Certificate/license numbers
 - l. Vehicle identifies
 - m. Device identifier & serial numbers
 - n. URLs
 - o. IP addresses
 - p. Biometric identifiers (finger and voice prints)
 - q. Full face photographic images
 - r. Any other unique identifying number (DOC number). See 45 C.F.R.164.514 (c) for additional guidance.
2. A person with knowledge of and experience with generally accepted statistical and scientific principles and methods for rendering information not individually identifiable has done **all** of the following:
 - a. Applied those principles and methods
 - b. Determined that the risk is very small that recipient of the information could use the information alone or combined with other available information to identify the individual
 - c. Documented the methods and results of the analysis that the information has been de-identified.