Safe Harbor Method

Under the safe harbor method, information is presumed to be de-identified if a covered entity:

- Has no actual knowledge that the information could be used to identify the subject of the information (alone or in combination with other information); and

- Removes 18 specific identifiers from the information. The 18 identifiers that must be removed are:

    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 if, according to the current publicly available data from the Bureau of 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;

    4. Telephone numbers;

    5. Fax numbers;

    6. Email 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 URLs;

    15. IP addresses;

    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.