

# Guidance: Protected Health Information (PHI) Identifiers

## Protected Health Information (PHI) Identifiers

The federal HIPAA regulation specifies a number of data elements that are considered identifiers. These identifiers are considered protected health information or PHI when used in relation to the provision of past, present, or future physical or mental health care and/or payment for health care and typically cannot be released without written patient authorization unless provided for under [Privacy Policy A05-12 Permitted Uses and Disclosures to Carry Out Treatment Payment and Health Care Operations](#).

The following are considered identifiers under the HIPAA Privacy Rule:

- (A) Names;
- (B) All 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 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 are changed to 000.
- (C) 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;
- (D) Telephone numbers;
- (E) Fax numbers;
- (F) Electronic mail addresses;
- (G) Social security numbers;
- (H) Medical record numbers;
- (I) Health plan beneficiary numbers;
- (J) Account numbers;
- (K) Certificate/license numbers;
- (L) Vehicle identifiers and serial numbers, including license plate numbers;
- (M) Device identifiers and serial numbers;
- (N) Web Universal Resource Locators (URLs);
- (O) Internet Protocol (IP) address numbers;
- (P) Biometric identifiers, including finger and voice prints;
- (Q) Full face photographic images and any comparable images; and
- (R) Any other unique identifying number, characteristic, or code

**Any questions/comments/concerns please feel free to reach out to  
the Privacy Program at:**

**773-834-9716 or [hpo@bsd.uchicago.edu](mailto:hpo@bsd.uchicago.edu)**