


Compliance Education

HIPAA Tip Sheet: Personal Identifiers

Any information that can be used to uniquely identify an individual is a personal identifier. If an identifier is included with patient/member health information, it is considered PHI under HIPAA. If the information includes any of the 18 identifiers, it should be protected against unauthorized disclosure.

18 HIPAA Identifiers

The Department of Health and Human Services (HHS) lists the 18 HIPAA identifiers as follows:

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1. Patient names
 2. Geographical elements (such as a street address, city, county, or zip code)
 3. Dates related to the health or identity of individuals (including birthdates, date of admission, date of discharge, date of death, or exact age of a patient older than 89)
 4. Telephone numbers
 5. Fax numbers
 6. Email addresses
 7. Social security numbers
 8. Medical record numbers
 9. Health insurance beneficiary numbers
 10. Account numbers
 11. Certificate/license numbers
 12. Vehicle identifiers
 13. Device attributes or serial numbers
 14. Digital identifiers, such as website URLs
 15. IP addresses
 16. Biometric elements, including finger, retinal, and voiceprints
 17. Full face photographic images
 18. Other identifying numbers or codes

<https://compliance-group.com/protected-health-information-understanding-phi/>

For example, a list of patient/member names with their respective diagnoses is considered PHI. However, a listing of the most frequent diagnoses without any identifiers would not be considered PHI.

Tip: For verbal interactions, inform the patient/member to be mindful of what is being disclosed, as it may be overheard by others. Follow HIPAA guidelines available in the HIPAA Pocket Guide.

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For routine HIPAA questions, please contact the HIPAA and Privacy Team at their email:

HIPAA@vnshealth.org

Report potential violations via web at www.vnshealth.ethicspoint.com or

VNS Health Compliance Hotline at 1-888-634-1558