



CERTIFICATION OF DE-IDENTIFICATION

Protected health information (PHI) may be classified as de-identified by the following methods: (1) certifying that none of the 18 HIPAA-defined identifiers (Box 1) are used, reviewed or recorded by the researchers or staff (45 CFR 164.514(b)(2)); or (2) certifying through statistical analysis on each identifier contained within the data that the likelihood of an individual being identified using the data in whole or in part is very small. Statistical de-identification must be done by a qualified statistician, and the methods and results of the analysis must be documented (45 CFR 164.514(b)(1)(i and ii)).

Box 1. HIPAA-defined identifiers.

- Names
- All geographic subdivisions smaller than a state, including street address, city, county, precinct, ZIP code, and their equivalent geographical codes, except for the initial three digits of a ZIP code if a) the geographical unit formed by combining all ZIP Codes with the same three initial digits contains more than 20,000 people or b) the initial three digits of a ZIP code for all such geographic units containing 20,000 or fewer people are changed to 000
- Telephone numbers
- 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 ages and elements may be aggregated into a single category of age 90 or older
- Fax numbers
- Email addresses
- Social Security numbers
- Medical record numbers
- Account numbers
- Health plan beneficiary numbers
- Certificate/license numbers
- Vehicle identifiers and serial numbers
- Device identifiers and serial numbers
- Web universal resource locators (URLs)
- Internet protocol (IP) address numbers
- Biometric identifiers, including fingerprints and voiceprints
- Full-face photographic images and any comparable images
- Any other unique identifying number, characteristic, or code, unless otherwise permitted by the Privacy Rule for re-identification



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Please check the box next to the de-identification method used.

Method 1: No Identifiers Used, Reviewed, or Recorded

The PHI used, reviewed or recorded by research personnel for this research project does not include any of the 18 HIPAA-defined identifiers as related to the individual, relatives, employers or household members of the individual.

Method 2: De-identification by Statistical Analysis

(i) A person with appropriate knowledge of and experience with generally accepted statistical and scientific principles and methods for rendering information not individually identifiable has performed such analysis on each of the identifiers included in the data set. It has been determined that there is a very small risk the information could be used, alone or in combination with other reasonably available information, by the intended recipient to identify an individual who is the subject of the information, alone or in combination with other reasonably available information.
(ii) Documentation from the statistician that should indicate: (1) the statistician’s name, credentials and contact information; (2) the date(s) of analysis, method(s) used, results obtained; (3) a statement that the likelihood of re-identification is very small; and (4) the statistician’s signature and date of signature.

Check one:

___ I have attached documentation with the required information from the statistician to this form.

___ I have attached the **Certificate for De-identification by Statistical Analysis** completed by the statistician to this form.

By signing below, I certify the above chosen method has been used to de-identify data to be deposited into the Brown Digital Repository, and the data are now properly classified as de-identified under HIPAA.

By: _____

Date: _____

Name: _____

Title: _____



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Certificate for De-identification by Statistical Analysis
To be Completed by the Statistician

Date of the analysis: _____

Name and credentials of the statistician:

Contact information for the statistician, including mailing address, phone number, and email address:

The method(s) used:

The results obtained:

I _____ certify the risk is very small that the information could be used, alone or in combination with other reasonably available information, by an anticipated recipient to identify an individual who is a subject of the information.

By: _____

Date: _____

Name: _____