ATTESTATION STATEMENT

Dear Program Director/ID Faculty Attending:

To ensure that HIPAA privacy regulations (below) are met, we require the author's program director or ID faculty attending to review the case and validate that it is in compliance with these regulations. If you have not already read the case presentation, please contact the author to obtain a copy for your review. The case cannot be uploaded by the author without your signed attestation statement below.

If you have reviewed the case presentation and it meets HIPAA regulations and is free of the 18 identifier elements listed below, please check the box, type your name, and sign below. If it does not meet HIPAA regulations, please ask the author to remove patient-identifiable aspects before submitting your attestation.

Yes:

☐ I _____, understand and can attest that the case presentation is in compliance with HIPAA Regulations.

Signature _____ Date _____

De-identifying Protected Health Information Under the Privacy Rule

Covered entities may use or disclose health information that is de-identified without restriction under the Privacy Rule. Covered entities seeking to release this health information must determine that the information has been de-identified using either statistical verification of de-identification or by removing certain pieces of information from each record as specified in the Rule.

The Privacy Rule allows a covered entity to de-identify data by removing all 18 elements that could be used to identify the individual or the individual's relatives, employers, or household members; these elements are enumerated in the Privacy Rule. The covered entity also must have no actual knowledge that the remaining information could be used alone or in combination with other information to identify the individual who is the subject of the information. Under this method, the identifiers that must be removed are the following:

1. Names
2. 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, according to the current publicly available data from the Bureau of the Census:
    a. The geographic unit formed by combining all ZIP Codes with the same three initial digits contains more than 20,000 people.
    b. The initial three digits of a ZIP Code for all such geographic units containing 20,000 or fewer people are changed to 000.

3. All elements of dates (except year) 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.
4. Telephone numbers.
5. Facsimile numbers.
6. Electronic mail 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 universal resource locators (URLs).
15. Internet protocol (IP) address numbers.
16. Biometric identifiers, including fingerprints and voiceprints.
17. Full-face photographic images and any comparable images.
18. Any other unique identifying number, characteristic, or code, unless otherwise permitted by the Privacy Rule for re-identification.

Source: U.S. Department of Health and Human Services, National Institutes of Health. (2 Feb. 2007). "HIPAA Privacy Rule". Retrieved from http://privacyruleandresearch.nih.gov/pr_08.asp