

EDUCATIONAL ACTIVITY CERTIFICATION OF DE-IDENTIFICATION

Educational Activities, including case presentations, that involve the use of de-identified Protected Health Information (PHI) is exempt from HIPAA requirements. Methods by which data may be classified as de-identified are 1) by certifying that none of the HIPAA-defined identifiers listed below are used, reviewed or recorded by the researchers or staff 2) by certifying that as a member of our covered entity the individual using PHI to create a de-identified data set a) keeps all information seen in the process of creating the de-identified data strictly confidential, b) does not record any of the identifiers defined by HIPAA, and c) cannot link the data back to the individual in any way.

General Information:

Project Title: _____

Presenter's Name: _____

Purpose of Presentation: _____

Date of Presentation: _____

HIPAA-Defined Identifiers:

This list is provided for your reference.

Names	Address ²	Social security numbers
Date of birth ¹	Telephone numbers	Medical record numbers
Admission date	Fax numbers	Health plan beneficiary numbers
Discharge date	Electronic mail addresses	Account numbers
Date of death	Biometric Identifiers	Certificate/License numbers
Full-face photographic images and any comparable images	Device identifiers and serial numbers	Vehicle identifiers and serial numbers, including license plate numbers
IP (Internet Protocol) Address Numbers	URLs (Universal Resource Locators)	

¹Any ages over 89 must only be reported in an aggregate category of age 90 or older

²Geographic subdivisions smaller than a state - except for the initial three digits of a zip code if, according to the current publicly available data from the Bureau of the Census

**Any other unique identifying number, characteristic, or code excepted as permitted

Certification:

Initial next to the method used to de-identify the data set.

Method 1 – No Identifiers Used, Reviewed or Recorded (45 CFR 164.514(b)(2))

I certify that the HIPAA-defined identifiers related to the individual, relatives, employers and/or household members of the individual will be removed from the data before it is used in any way for this project. *(The identifiers are not needed to conduct the research).*

Method 2 – No Identifiers Recorded During the Creation of a De-identified Data Set (45 CFR 164.502(d)(1))

I certify that the Protected Health Information (PHI) recorded by project personnel to create a de-identified data set for this project will not include any of the HIPAA-defined identifiers and that no link will be able to be made back to the individual. Personnel reviewing records have agreed to keep any PHI seen during the course of records review as strictly confidential.

(The identifiers are needed to conduct the project, but are removed for any "created" materials – charts, papers, presentations, etc.)

(Signature of Presenter)

(Date)

(Signature of GME Program Director)

(Date)