

## University of Central Arkansas HIPAA De-identification Certification Form

De-identified Information is health information that cannot be linked to an individual. HIPAA lists 18 specific identifiers (listed below) that must be removed to qualify as de-identified data. The following identifiers can be recorded: initial 3 digits of the zip code if population is greater than 20K, age if less than 90, gender and ethnicity.

**Check the appropriate box:**

- My department is in the Covered Entity
- My department is not in the Covered Entity.

**Instructions:** If you are de-identifying protected health information (PHI) for your study and **your department is in the Covered Entity**, complete the de-identification certification form and submit it with your IRB application.

**If you are de-identifying PHI for your study and your department is NOT in the Covered Entity**, complete the de-identification certification form and submit a Business Associate Agreement (BAA) submit it with your IRB application. Contact: Warren Readnour, General Counsel, at (501) 450-5007 for a BAA.

Your study does not meet the qualifications for de-identification if any of the following HIPAA identifiers are used.

- Names (individual, employer, relatives, etc.)
- Address (street, city, county, zip code – initial three digits if geographic unit contains less than 20K people, or any other geographical codes)
- Telephone/Fax Numbers
- Social Security Numbers
- Dates (except for year)
  - Birth Date
  - Admission Date
  - Discharge Date
  - Date of Death
  - Ages >89 and all elements of dates indicative of such age (except that such age and elements may be aggregated into a category "Age>90")
- E-mail addresses/URLs (Web Universal Resource Locators)/IP (Internet Protocol) addresses
- Medical Record Numbers
- Health Plan Beneficiary Numbers
- Account Numbers
- Certificate/License Numbers
- Vehicle Identifiers and Serial Numbers (e.g. VINs, License Plate Numbers)
- Device Identifiers and Serial Numbers
- Biometric Identifiers (e.g. finger or voice prints or full face photographic images)
- Any other unique identifying number, characteristic, or code

**Re-identification:** The Privacy Rule permits a researcher to assign and retain a code to allow the re-identification of PHI. The code can not be derived from or related to the information about the subject. For example, you would not record the subject's initials and last 4 digits of a subject's social security number because the code is derived from the subject. The researcher may not disclose the re-identification code or its method of re-identifying PHI.

**Assurance Statement:** The information on this form is accurate and the identifiers listed in this document will not be recorded as part of this research study and if applicable, I agree to the Privacy Rule's requirements listed above for re-identification.

Principal Investigator's Name: \_\_\_\_\_ Date: \_\_\_\_\_

Principal Investigator's Signature: \_\_\_\_\_