HIPAA Protected Health Information Decision Tree

HIPAAtrek
Guiding Your HIPAA Compliance

Is the information health-related?

No → The information is NOT protected health information

Yes ↓

Is the health information accompanied by identifiers that can be attributed to an individual? The identifiers are:

1. Names (full name or last name and initial)
2. All geographic subdivisions smaller than a State, including street address, city, county, precinct, zip code, and their equivalent geocodes, 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, and
   b. The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000.
3. All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, and date of death. This includes 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. Fax numbers
6. Email addresses
7. Social Security Numbers
8. Medical record numbers
9. Health plan beneficiary numbers
10. Account numbers
11. Certificate/license numbers
12. Vehicle identifiers, such as serial numbers and 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 finger, retinal, and voice prints
17. Full face photos and any comparable images
18. Any other unique identifying number, characteristic, or code

No → The information is NOT protected health information

Yes ↓

It is individually identifiable health information (IIHI).
Was the IIHI created, maintained, received, or transmitted by a covered entity or business associate?

No → The information is NOT protected health information

Yes → The information IS protected health information