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**PURPOSE**

To provide procedures and guidance to de-identify an individual's health information for use and disclosure.

**PROCEDURE****De-Identification of Protected Health Information (PHI)**

The Michigan Department of Health and Human Services (MDHHS) is allowed to use PHI to create de-identified information.

**Note:** When PHI is de-identified using either of the 2 following methods it is no longer subject to the privacy rule:

1. Using appropriate scientific principle to render the PHI not individually identifiable through statistical means.
2. To remove all of a list of enumerated identifiers of the individual.

MDHHS may create a Limited Data Set for research, public health, or health care operation purposes only. In a Limited Data Set, the data is completely de-identified with the exception of some dates and demographic information; see Limited Data Set Policy. To disclose a Limited Data Set there must be a Limited Data Set Use Agreement with the recipient.

MDHHS can de-identify PHI by removing all of the following:

- Names.
- Addresses (all geographic subdivisions smaller than a state - 3 digit zip codes are allowed for populations greater than 20,000).
- Dates (Including birth, admission, discharge, etc.)
- Telephone numbers.
- Fax numbers.
- Electronic mail addresses.
- Social security numbers.
- Medical record numbers.

- Health plan beneficiary numbers.
- Account numbers.
- Certificate/license numbers.
- Vehicle identifiers and serial numbers. (Includes license plate numbers. device identifiers and serial numbers.)
- Web universal resource locators (URLs).
- Internet Protocol (IP) address numbers.
- Biometric identifiers, including finger and voice prints.
- Full face photographic images and any comparable images.
- And any other unique identifying number, characteristic, or code.

**REFERENCES**

45 CFR §164.402(d), §164.514(a), §164.515(b), §164.515(c), §164.515(e).

**CONTACT**

For additional information concerning this procedure, contact the MDHHS Bureau of Legal Affairs.