Below is a sample de-identification plan. Please use the template below to provide the de-identification process to be used for your project. The plan should show how MHS sensitive data elements (or quasi-identifiers) will be de-identified as well as how the 18 HIPAA identifiers will be handled (e.g., dropped, collapsed, etc.). Please email DHA.DataSharing@mail.mil if you have any questions.

DHA DSAA #:

Project Title:

In order to de-identify data, <INSERT ORG NAME> excludes all 18 categories of HIPAA identifiers.

18 HIPAA Identifiers	De-identification process
Name	Dropped
Geographic location (zip codes)	Dropped or First 3 digits
Dates	Dropped or Year only provided
Telephone numbers	Dropped
Fax numbers	Dropped
Emails	Dropped
SSN	Dropped or Replace with a unique non-identifying study ID
MRN	Dropped or N/A
Health plan beneficiary numbers (this is equivalent to the EDIPN)	Dropped or N/A
Account numbers (this includes record ids)	Dropped or N/A
Certificate/license numbers	Dropped or N/A
Vehicle ID numbers	Dropped or N/A
Device ID numbers	Dropped or N/A
URLs	Dropped or N/A
IP addresses	Dropped or N/A
Biometric identifiers	Dropped or N/A
Full face photography	Dropped or N/A
Any other unique identifying number	Dropped or Replaced with pseudo-random IDs for all ID variables (EDIPN, DMISID, PROV_ID, Pharmacy_ID , etc…)

Demographics: Rank, Pay grade, race, ethnicity, education, and age are collapsed into general categories. Below are examples of categories of demographic variables commonly provided:

Age	Grade	Education	Race	Ethnicity	Religion
<20	E1-E4	<High School	American Indian, Alaskan Native, Hawaiian, or Pacific Islander	Hispanic origin	Christian or Non-Christian
20-24	E5-E-9	Some College	Asian	Not of Hispanic origin	
25-29	O1-O5	Bachelor's Degree	Black		
30-34	O6-O10	Advanced Degree	White		
35-39	WO*		Other		
>=40					

Free Text Fields: All free text variables will be dropped from a de-identified dataset. This is done since there is not a standardized, systematic approach to use to ensure all PII is removed from the free text field. The only way we could do this is to review each variable individually, which is not practical with the large dataset we typically release.

Cell Size: If individual level datasets or summary tables contain cells with less than 11 counts, the data is either deleted and instead an asterisk will indicate that the count was too small, or the data will be re-categorized so that the new cell size will no longer contain counts of 11 or less.