



SO WHAT'S THE  
DIFFERENCE?

**PII**

PERSONALLY  
IDENTIFIABLE  
INFORMATION

VS.

**PHI**

PROTECTED  
HEALTH  
INFORMATION

## What's PII?

PII stands for Personally Identifiable Information. It is any information that permits your identity to be directly or indirectly inferred, including any data linked or linkable to you.

Unlike PHI (which is governed by HIPAA), PII is governed by each State. Therefore, it is imperative to verify the State's law governing any question related to an individual's PII.

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## What counts as PII?

- Date of birth
- Social security numbers
- Email addresses
- Bank account information
- Account numbers
- Drivers license number
- Personal property information
- Vehicle identification number (VIN)
- License plate number

## What's PHI?

PHI is an individual's identifiable health information held or transmitted in writing or verbally by a Covered Entity (health care provider, healthcare clearing-house, or health plan).

Information is considered *health information* if it relates to an individual's:

- **past, present, or future physical or mental health condition;**
- **the provision of health care; or**
- **the past, present, or future payment for health care**

### NOT Health Information If:

- contained in employment records and education records; and
- it pertains to an individual who has been deceased for more than 50 years

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## What counts as PHI?

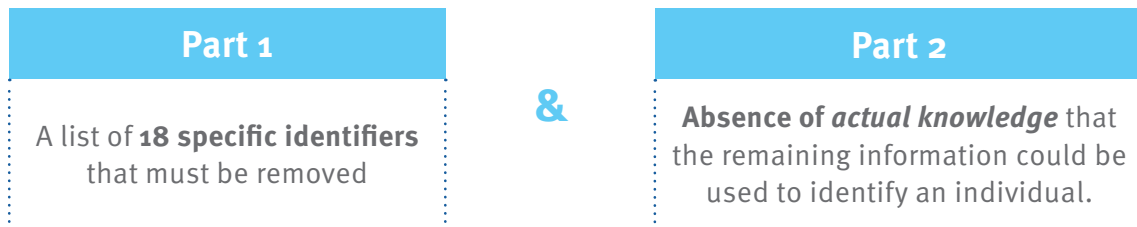
When combined with health information, these identifiers may create PHI:

- Names
- Telephone numbers
- Fax numbers
- Medical record numbers
- Certificate/license numbers
- Vehicle identifiers and serial numbers  
*Example: license plate numbers*
- Biometric identifiers  
*Example: finger and voice prints*
- Health plan beneficiary numbers
- Device identifiers and serial numbers
- Web Universal Resource Locators (URLs)
- Internet Protocol (IP) address
- Geographic subdivisions smaller than a state
- Dates (except year) directly related to an individual
- Full face photographic images and any comparable images
- Any other unique identifying number, characteristic, or code

## De-Identified Information

Health information that has been de-identified is no longer considered PHI and may be used and disclosed for any purpose. “De-identified” simply means that all the information in the PHI that could be used to identify an individual has been removed.

**The government has provided safe harbor guidance for de-identification.**



### Part 1: The 18 Identifiers

The following identifiers of an individual or of relatives, employers, or household members of the individual, must be removed:

1. Names
2. All geographic subdivisions smaller than a State, such as street address, city, county, precinct, zip code, etc.
3. All elements of dates (except year) for dates directly related to an individual, such as birth date, admission date, etc.
4. Telephone numbers
5. Fax numbers
6. Electronic mail addresses
7. Social security numbers
8. Medical record numbers
9. Health plan beneficiary numbers
10. Account numbers
11. Certificate/license numbers
12. Vehicle identifiers and serial numbers, including license plate numbers
13. Device identifiers and serial numbers
14. Web Universal Resource Locators (URLs)
15. IP address numbers
16. Biometric identifiers, including finger and voice prints
17. Full face photographic images and any comparable images
18. Any other unique identifying number, characteristic, or code

### Part 2: The Absence of Actual Knowledge

*Actual knowledge* means clear and direct knowledge that the remaining information could be used, either alone or in combination with other information, to identify an individual who is a subject of the information.

In other words, a Covered Entity has *actual knowledge* if it concludes that the de-identified information could still be used to identify an individual.