

The Safe Harbor pocket card

The eighteen identifiers, and which ones a tool can find for you. Print it and pin it above the workstation.

■ The Attending

A TOOL CAN FIND THESE

Mechanical, patterned, and catchable by software.

- Names carrying a title
- Dates, and ages over 89
- Phone, fax, email
- Social security numbers
- Medical record, account and health plan numbers
- NHS and hospital numbers
- Licence, NPI and certificate numbers
- Device serial numbers
- URLs and IP addresses
- Street address, ZIP, UK postcode, county
- A city written beside a state, or after "lives in"

ONLY YOU CAN FIND THESE

No pattern marks them. They need a reader, not a regex.

- A city with no state and no residence verb
- Biometric identifiers
- Full face photographs
- Employer or facility names
- Relationship descriptors
- Any other unique characteristic or code, **including a rare diagnosis in a small population**

THE FIVE STEPS, IN ORDER

- 1 Mask before you paste.** Run the text through the de-identifier before it reaches any AI tool, not after.
- 2 Watch the left column empty.** The mechanical identifiers go as you type. That is a first pass, not a clearance.
- 3 Read it back as a stranger would.** If someone who knows this patient could recognise them, strip more or do not use the case at all.
- 4 Decide on the facility yourself.** The treating hospital is left in on purpose: it is not one of the eighteen. A named hospital plus a rare presentation still identifies someone. That call is yours.
- 5 Check your own knowledge.** Safe Harbor also requires that you have no actual knowledge the remaining information could identify the person.

The eighteen identifiers are listed at 45 CFR 164.514(b)(2). This card is a working aid, not legal advice, and it creates no compliance position. It does not make any AI tool HIPAA compliant and it does not certify de-identification. It is not a medical device and not clinical decision support. Your employer's policy, your BAA and your own judgement still govern what you may paste anywhere.
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