

Mental Health Records De-Identification Checklist

Identifiers Removal

☐ Patient Name ☐ Geographic subdivisions smaller than state ☐ All elements of dates (except year) directly related to an individual ☐ Phone numbers ☐ Fax numbers ☐ Email addresses ☐ Social Security Numbers ☐ Medical record numbers ☐ Health plan beneficiary numbers ☐ Account numbers ☐ Certificate/license numbers ☐ Vehicle identifiers and serial numbers ☐ Device identifiers and serial numbers ☐ Web URLs ☐ IP addresses ☐ Biometric identifiers (fingerprints, voice prints) ☐ Full-face photographic images ☐ Any other unique identifying number or code

Free-text Review

☐ Review notes for indirect identifiers (e.g., rare diagnoses, occupations) ☐ Remove or generalize explicit references to relationships (e.g., spouse, children) ☐ Check for unique circumstances that can lead to re-identification

Data Minimization

☐ Limit data shared to only what is necessary ☐ Aggregate data or use categories where possible (e.g., age ranges instead of exact age)

Quality Assurance

☐ Secondary review for residual identifiers ☐ Log date and staff involved in de-identification

Notes