

### Use of Patient Information for Single Case Studies and Journal Publication

The UW Human Subjects Division (HSD) is frequently asked if review, publication, or presentation of a single case report requires IRB approval as a research activity. UW HSD and UW Medicine Compliance do not require IRB approval in this scenario.

Instead, UW Medicine Privacy Policy 19, *Protected Health Information, Limited Data Set, and De-Identification of Protected Health Information*, provides the following guidance: [http://depts.washington.edu/comply/docs/PP\\_19.pdf](http://depts.washington.edu/comply/docs/PP_19.pdf)

#### **Case Studies/Journals for Publication:**

***Patient identifiable information cannot be used for case studies and journal stories for publication without patient authorization. Additionally, UW Medicine encourages workforce members to obtain patient authorization prior to submitting de-identified case studies or journal stories for publication.***

Therefore, to use identifiers, such as patient names, photographs, dates of service, birth dates, etc. you MUST obtain a signed authorization from the patient (or their legally authorized surrogate) who is the subject of the case study. This authorization must be placed in the patient's medical record. Use UW Medicine form UH0626.

If no patient identifiers are to be used, it is not required that an authorization be obtained, but it is recommended that, where practicable, the patient is told they will be the subject of a case study or publication. It is encouraged that an authorization be obtained even without the use of patient identifiers – particularly when the case is highly unique.

Under Federal Law, a UW Medicine entity may de-identify PHI by removing eighteen (18) specific identifiers, provided the entity does not have knowledge that the information could be used alone or in combination with other information to identify the individual who is the subject of the information. The eighteen (18) specific identifiers are:

Names,  
All geographic subdivisions smaller than state including:  
Street Address  
City  
County  
Precinct  
Zip code and equivalent geo code *except if the initial 3 digits of a zip code:*  
Represents a geographic unit in which combining all zip codes with the same 3 initial digits contains more than 20,000 people, and  
The initial 3 digits of a zip code for all such geographic units containing 20,000 or fewer people are changed to "000."  
All elements of dates (except year) directly related to an individual including:  
Birth date,  
Admission date,  
Discharge date,  
Date of death, and

All ages over 89 (including date elements indicative of such age [including year], except when all ages of 90 or older can be aggregated into a single category),  
Telephone numbers,  
Fax numbers,  
E-mail addresses,  
Social security numbers,  
Medical record numbers,  
Health plan beneficiary numbers,  
Account numbers,  
Certificate/license numbers,  
Vehicle identifiers and serial numbers (including license plate numbers),  
Device identifiers and serial numbers,  
Web Universal Resource Locators (URLs),  
Internal Protocol (IP) address numbers,  
Biometric identifiers, including finger/voice prints,  
Full face photographic images and any comparable images, and  
Any other unique identifying number, characteristic or code