

The 18 HIPAA Identifiers

A Therapist's Quick Reference Guide

Why This Matters

When therapists think about protected health information (PHI), they often focus on names.

Names are certainly important, but HIPAA's definition of identifiable information extends far beyond a person's name. In many situations, a combination of details can identify a client even when obvious identifiers have been removed.

This guide provides a quick reference to the 18 identifiers recognized under HIPAA and examples of how they may appear in therapy practice.

A Helpful Question to Ask

Before entering information into an AI tool, consultation note, training example, or educational discussion, ask:

Could someone who knows this client reasonably identify them from the information being shared?

That question often provides more insight than focusing on names alone.

The Question to Remember

Many therapists focus on whether a client's name has been removed. While names are important, they are only one part of the picture. Information may still be identifiable through a combination of details, including occupation, community visibility, family circumstances, highly public events, or other unique characteristics.

Instead of asking: ❌ **Did I remove the client's name?**

Ask: ✅ **Could someone who knows this client still identify them?**

The 18 HIPAA Identifiers

Direct Personal Identifiers

These identifiers directly point to a specific individual.

- Name
- Telephone Number
- Fax Number
- Email Address
- Social Security Number
- Medical Record Number
- Health Plan Beneficiary Number
- Account Number
- Certificate or License Number

Technology & Digital Identifiers

These identifiers often appear in electronic systems and online activity.

- Web URLs
- IP Addresses
- Device Identifiers and Serial Numbers

Other Unique Identifiers

These identifiers may not fit neatly into another category but can still identify a specific person.

- Vehicle Identifiers and Serial Numbers
- Any Other Unique Identifying Number, Characteristic, or Code

Location & Date Identifiers

These details can identify a person based on where they are or when events occurred.

- Geographic information smaller than a state
- Dates related to an individual (birth date, admission date, discharge date, appointment dates)

Images & Biometric Identifiers

These identifiers can uniquely identify an individual through physical characteristics.

- Full-Face Photographs and Comparable Images
- Biometric Identifiers (fingerprints, voiceprints, facial recognition data)

Need Additional Support?

Understanding HIPAA requirements is one part of building a compliant practice. Implementing policies, evaluating technology, conducting risk analyses, and creating sustainable workflows often requires a broader operational strategy. Guardian Clinical Essentials provides education, consulting, compliance support, and implementation guidance designed specifically for therapists and mental health practices.

Learn more about our compliance services at www.guardianclinicalessentials.com or contact us to discuss your practice's needs.

Guardian Clinical Essentials™

We'll protect your practice so you can keep changing lives.



GUARDIAN™
Clinical Essentials

This material is educational and does not replace individualized legal advice.

www.guardianclinicalessentials.com

© 2026 Guardian Clinical Essentials™. For internal use only.