

# Patient-note annotation exercise

Healthcare privacy teams and security engineers

[Read the complete guide on aona.ai](#)

Removing a patient's name is not enough to establish HIPAA de-identification. HHS describes two methods: Safe Harbor, with its identifier-removal and actual-knowledge conditions, and Expert Determination. Review narrative clues and the recipient's context as well as structured fields.

Compare three treatments of one invented note. The worksheet illustrates review decisions, not a legal determination about a real dataset.

Entirely synthetic patient, events and identifiers. No expert determination or product test has been performed.

## Your review

Reviewer: \_\_\_\_\_ Date: \_\_\_\_\_

Organisation or team: \_\_\_\_\_

☐ **Record the chosen legal method**

Distinguish Safe Harbor review, documented Expert Determination and ordinary masking.

☐ **Review the complete output**

Apply identifier and contextual checks to free text, all file content and relevant metadata.

☐ **Keep the release conditions**

Record the recipient, remaining information and reason the selected method is satisfied; do not invent reviewer sign-off.

Checked items record your review, not a compliance approval or an installed-product test result.

## Notes and next actions

Decision and scope: \_\_\_\_\_

Evidence to collect: \_\_\_\_\_

Owner and next review date: \_\_\_\_\_

## Review matrix

| Item in invented note       | Why review it                           | Illustrative treatment                                    |
|-----------------------------|-----------------------------------------|-----------------------------------------------------------|
| Mara Example; MRN TEST-4821 | Name and medical-record identifier.     | Remove both, rather than replacing only the visible name. |
| Seen on 14 March 2026       | Date directly related to an individual. | Retain 2026 only for a Safe Harbor review.                |

| Item in invented note                     | Why review it                                | Illustrative treatment                                                     |
|-------------------------------------------|----------------------------------------------|----------------------------------------------------------------------------|
| Age 93                                    | Age above 89.                                | Use the category age 90 or older.                                          |
| Only harbour master in a small town       | Distinctive context may identify the person. | Omit occupation and locality where unnecessary; assess remaining context.  |
| Patient A attended on 14 March, age 93    | Masking retains multiple identifying clues.  | Do not label this version de-identified.                                   |
| Older adult discussed a routine follow-up | More general wording loses clinical detail.  | Check task utility and the complete chosen method before any real release. |

## Masking is one transformation

- **Invented original:** Mara Example, MRN TEST-4821, age 93, attended on 14 March 2026.

The worksheet also includes a distinctive occupation.

- **Name-only masking:** Patient A, age 93, attended on 14 March 2026.

Date and age details remain. This is not de-identification.

- **Reduced-detail example:** An adult aged 90 or older discussed a routine follow-up in 2026.

Teaching example only. Apply the full chosen method to a real record.

### Invented original

Mara Example, MRN TEST-4821, age 93, attended on 14 March 2026. The note describes the only harbour master in a small town seeking a routine follow-up.

### Ordinary masking, insufficient by itself

Patient A, age 93, attended on 14 March 2026. The note describes the only harbour master in a small town seeking a routine follow-up.

### Reduced-detail teaching example

An adult aged 90 or older discussed a routine follow-up in 2026.

The last version is a teaching example only. This exercise does not establish that a real record meets Safe Harbor or Expert Determination.

## Sources and scope

Sources checked 2026-09-21. Review the current requirements and your actual agreement before using this workbook for a real decision. General information; no professional approval or installed-product result is represented. Detected entities and redacted output do not establish HIPAA Safe Harbor or Expert Determination. Aona does not provide an expert's legal de-identification decision.

[HHS: Methods for de-identification of PHI](#). Safe Harbor and Expert Determination, identifiers in free text, actual knowledge and residual identification risk.