Exhibit 5039– EX.A
De-identification
Revision Date: 3/14/03

Information is de-identified if *none* of the following 18 types of identifiers is contained in the information *and* if no one accessing the information has *actual knowledge* that the information could be used – alone or in combination with other information – to identify any individual who is the subject of the information.[i] Note that this does not prohibit coding records so that they may later be re-identified, so long as the code does not contain information about the subject of the information (for example, the code may not be a derivative of the individual's Social Security Number) and is not used or disclosed for any other purpose, and so long as the re-linking mechanism (*e.g.*, the subject log or coding algorithm) is not disclosed to any persons or organizations outside the [institution].

1. Names

2. All geographic subdivisions smaller than a State, including:

    - street address

    - city

    - county

    - precinct

    - zip codes and their equivalent geocodes, except for the initial three digits of a zip code if, according to the current publicly-available data from the Bureau of the Census: (1) the geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people, and (2) the initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000.

3. Telephone numbers

4. Fax numbers

5. E-mail addresses

6. Social Security numbers

7. Medical record numbers

8. Health plan beneficiary numbers

9. Account numbers

10. All elements of dates (except year) for dates related to an individual, including:

    - birth date

    - admission date

    - discharge date

    - date of death

    - all ages over 89 and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older

11. Certificate/license numbers

12. Vehicle identifiers and serial numbers, including license plate numbers

13. Device identifiers and serial numbers

14. Web Universal Resource Locators (URLs)

15. Internet Protocol (IP) address numbers

16. Biometric identifiers, including finger and voice prints

17. Full face photographic images and any comparable images

18. Any other unique identifying numbers, characteristics, or codes

i   Information may also be considered "de-identified" if a person with appropriate knowledge of, and experience with, generally accepted statistical and scientific principles and methods for rendering information not individually identifiable, (1) applying such principles and methods, determines that the risk is very small that the information could be used, alone or in combination with other reasonably available information, by an anticipated recipient to identify an individual who is a subject of the information, and (2) documents the methods and results of the analysis that justify such determination.