



NU-RES Tool for Classifying Human Subjects Data

Use this tool in conjunction with the Human Subjects Guidance Document

Personally Identifiable Information (PII)	Limited Data Set (LDS)	Considerations
<p>A data set containing any of these identifiers, or parts of the identifier, is considered “identified”:</p> <ol style="list-style-type: none"> 1. Name (including initials) 2. Address (all geographic subdivisions smaller than state: street address, city, county, zip code) 3. All elements (except years) of dates related to an individual (including birthdate, admission or discharge date, date of death, and exact age if over 89) 4. Telephone numbers 5. Fax number 6. Email address 7. Social Security Number 8. Medical record number 9. Health plan beneficiary number 10. Account number 11. Certificate or license number 12. Any vehicle identifiers, i.e. license plate 13. Device identifiers and serial numbers 14. Web URL 15. Internet Protocol (IP) address 16. Finger or voice print 17. Photographic image - Photographic images are not limited to images of the face 18. Any other characteristic that could uniquely identify the individual 	<p>A Limited Data Set must omit all of the identifiers listed in the left-hand column except for the following:</p> <ol style="list-style-type: none"> 1. City, state, zip code; 2. Dates of admission, discharge, service, date of birth, date of death; or 3. Ages in years, months or days or hours. <p>Initials are always considered PHI/PII!</p> <hr/> <p>Northeastern does not produce LDS because Northeastern is not a covered entity. Northeastern may receive LDS.</p> <p>De-identified Data</p> <p>All of the 18 HIPAA Identifiers in the left-hand column must be removed in order for a data set to be considered de-identified with caveats for the following:</p> <ol style="list-style-type: none"> 1. All geographic subdivisions smaller than a state, except for the initial three digits of the ZIP code: (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; 2. Ages in years and for those older than 89, all ages must be aggregated into a single category of 90 or older. 	<p>While the list of identifiable information leverages the identifiers and definitions for types of data sets, laid out the HIPAA regulation, Northeastern is not a covered entity.</p> <p>Northeastern is not subject to HIPAA.</p> <p>HIPAA is intended for healthcare providers that generate and transmit covered health information. The regulation requires strict security and reporting requirements.</p> <p>Because Northeastern is not subject to HIPAA, it is not a common practice to accept terms and conditions that may bind Northeastern to follow HIPAA because it may impose additional costs or liability to adequately protect the data.</p> <p>Regulations that refer to PII / the protection of human subjects data and do apply to Northeastern include:</p> <ol style="list-style-type: none"> 1. FERPA; 2. NIST; and 3. The Common Rule.
<p>Covered Entities subject to HIPAA may refer to this list of identifiers as Personal Health Information (PHI).</p>		