FDP Tool for Classifying Human Subjects Data

This chart is designed to streamline review of the type of human subject data for the purpose of classification for a DTUA.

Remember to also check your institutional policies and procedures for further guidance.

18 HIPAA Identifiers that comprise Personally Identifiable Information (PII)

PII may be used alone or with other sources to identify an individual. PII in conjunction with medical records (including payments for medical care) becomes Protected Health Information (PHI).

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 date, 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, including 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

A data set containing any of these identifiers, or parts of the identifier, is considered "identified"

HIPAA – Limited Data Set

A Limited Data Set must omit all of the HIPAA Identifiers in the left-hand column except for the following:
1. City, state, zip code
2. Dates of admission, discharge, service, date of birth, date of death
3. Ages in years, months or days or hours

To re-iterate: initials are always considered PHI/PII

HIPAA – De-identified Data

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:

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

FERPA – Personally Identifiable Information

In the context of FERPA, PII includes, but is not limited to:

1. Student's name
2. The name of the student's parent(s) or other family members
3. Address of the student or student's family
4. Student's personal identifiers, such as:
   a. Social Security Number;
   b. Student number; or
   c. Biometric record (i.e. Finger or voice print)
5. Student's other indirect identifiers, such as:
   a. Birthdate;
   b. Place of birth; or
   c. Mother's maiden name
6. Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty
7. Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates