



**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"> <li>1. Name (including initials)</li> <li>2. Address (all geographic subdivisions smaller than state: street address, city, county, zip code)</li> <li>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)</li> <li>4. Telephone numbers</li> <li>5. Fax number</li> <li>6. Email address</li> <li>7. Social Security Number</li> <li>8. Medical record number</li> <li>9. Health plan beneficiary number</li> <li>10. Account number</li> <li>11. Certificate or license number</li> <li>12. Any vehicle identifiers, i.e. license plate</li> <li>13. Device identifiers and serial numbers</li> <li>14. Web URL</li> <li>15. Internet Protocol (IP) address</li> <li>16. Finger or voice print</li> <li>17. Photographic image - Photographic images are not limited to images of the face</li> <li>18. Any other characteristic that could uniquely identify the individual</li> </ol>	<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"> <li>1. City, state, zip code;</li> <li>2. Dates of admission, discharge, service, date of birth, date of death; or</li> <li>3. Ages in years, months or days or hours.</li> </ol> <p><b>Initials are always considered PHI/PII</b></p> <hr/> <p>Northeastern does not produce LDS because Northeastern is not a covered entity. Northeastern may receive LDS.</p> <p><b>De-identified Data</b></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"> <li>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;</li> <li>2. Ages in years and for those older than 89, all ages must be aggregated into a single category of 90 or older.</li> </ol>	<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"> <li>1. FERPA;</li> <li>2. NIST; and</li> <li>3. The Common Rule.</li> </ol>
<p>Covered Entities subject to HIPAA may refer to this list of identifiers as <b>Personal Health Information (PHI)</b>.</p>		