

**IDENTIFIABLE INFORMATION:** Information that can be linked to specific individuals by the investigator(s) either directly or indirectly through coding systems. Identifiable information can include, but are not limited to:

Protected Health Information (PHI)	Personally Identifiable Information (PII)
<p>The Privacy Rule (HIPAA) protects all individually identifiable health information held or transmitted by a covered entity or its business associate, in any form or media, whether electronic, paper, or oral.</p> <p>PHI is information, including demographic data, that relates to:</p> <ul style="list-style-type: none"> <li>• the individual’s past, present or future physical or mental health or condition,</li> <li>• the provision of health care to the individual, or</li> <li>• the past, present, or future payment for the provision of health care to the individual,</li> </ul> <p>and that identifies the individual or for which there is a reasonable basis to believe it can be used to identify the individual. PHI 18 identifiers include:</p> <ol style="list-style-type: none"> <li>1. Names</li> <li>2. All geographic subdivisions smaller than a State, including street address, city, county, precinct, zip code, 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: <ul style="list-style-type: none"> <li>○ The geographic unit formed by combining all zip codes with the same three initial digits contains more than 20,000 people; and</li> </ul> </li> </ol>	<ul style="list-style-type: none"> <li>• Name, such as full name, maiden name, mother’s maiden name, or alias</li> <li>• Personal identification number, such as social security number (SSN), passport number, driver’s license number, taxpayer identification number, patient identification number, and financial account or credit card number</li> <li>• Address information, such as street address or email address</li> <li>• Asset information, such as Internet Protocol (IP) or Media Access Control (MAC) address or other host specific persistent static identifier that consistently links to a particular person or small, well defined group of people</li> <li>• Telephone numbers, including mobile, business, and personal numbers</li> <li>• Personal characteristics, including photographic image (especially of face or other distinguishing characteristic), x-rays, fingerprints, or other biometric image or template data (e.g., retina scan, voice signature, facial geometry)</li> <li>• Information identifying personally owned property, such as vehicle registration number or title number and related information</li> <li>• Information about an individual that is linked or linkable to one of the above (e.g., date of birth, place of birth, race, religion, weight, activities, geographical indicators, employment information, medical information, education information, financial information)</li> </ul> <p>The Family Educational Rights and Privacy Act (FERPA) specifically defines PII as including, but not limited to:</p>

<ul style="list-style-type: none"> <li>○ The initial three digits of a zip code for all such geographic units containing 20,000 or fewer people is changed to 000.</li> </ul> <ol style="list-style-type: none"> <li>3. All elements of dates (except year) for dates directly related to an individual, including birth date, admission date,, discharge date, date of death; and 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</li> <li>4. Telephone numbers</li> <li>5. Fax numbers</li> <li>6. Electronic mail addresses</li> <li>7. Social security numbers</li> <li>8. Medical record numbers</li> <li>9. Health plan beneficiary numbers</li> <li>10. Account numbers</li> <li>11. Certificate/license numbers</li> <li>12. Vehicle identifiers and serial numbers, including license plate numbers</li> <li>13. Device identifiers and serial numbers</li> <li>14. Web Universal Resource Locators (URLs)</li> <li>15. Internet Protocol (IP) address numbers</li> <li>16. Biometric identifiers, including finger and voice prints</li> <li>17. Full face photographic images and any comparable images, and</li> <li>18. Any other unique identifying number, characteristic, or code, (excluding a random identifier code for the subject that is not related to or derived from an existing identifier)</li> </ol>	<ol style="list-style-type: none"> <li>(a) The student's name;</li> <li>(b) The name of the student's parent or other family members;</li> <li>(c) The address of the student or student's family;</li> <li>(d) A personal identifier, such as the student's social security number, student number, or biometric record;</li> <li>(e) Other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name;</li> <li>(f) 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; or</li> <li>(g) 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.</li> </ol>
<p>Source: <a href="#">HIPAA</a></p>	<p>Sources: <a href="#">US GSA</a>, <a href="#">FERPA</a>, <a href="#">NIST</a></p>