

## **Individually Identifiable Health Information (IIHI)**

**IIHI:** Includes any subset of health information, including demographic information collected from an individual that:

- Is created or received by a health care provider, health plan, employer, or health care clearinghouse (an organization that codes health data);
- Relates to
  - The past, present or future physical or mental health or condition,
  - The past, present or future provision of care to an individual, or
  - The past, present or future payment for the provision of health care to an individual; and
- Identifies the individual (or there is a reasonable basis to believe that the information can be used to identify the individual.)

An authorization signed by the research subject is almost always required for the disclosure of individually identifiable health information.

**De-Identified Information:** Health information is considered de-identified when it does not identify an individual and the covered entity has not reasonable basis to believe that the information can be used to identify an individual. Information is considered de-identified if 18 identifiers are removed from the health information and if the remaining health information could not be used alone, or in combination, to identify a subject of the information. The identifiers include:

1. Names
2. Geographic subdivisions smaller than a state, including street address, city, county, precinct, zip code and equivalent geocodes, except for the initial three digits of a zip code to 000
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
4. Telephone numbers
5. Fax numbers
6. Electronic mail addresses
7. Social Security numbers
8. Medical record numbers
9. Health plan beneficiary numbers
10. Account numbers
11. Certificate / license numbers
12. Vehicle identifiers and serial numbers, including license plate numbers
13. Device identifiers and serial numbers
14. Web Universal Resource Locator (URL)
15. Biometric identifiers, including finger or voice prints
16. Full face photographic images and any comparable images
17. Internet Protocol address numbers
18. Any other unique identifying number characteristic or code

An authorization is frequently not required when acquiring de-identified data and a waiver of Authorization can be requested.

**Limited Data Set:** A limited data set is information disclosed by a covered entity to a researcher who has no relationship with the individual whose information is being disclosed. The covered entity is permitted to disclose PHI, with direct identifiers removed, subject to obtaining a Data Use Agreement (DUA) from the researcher receiving the limited data set. The PHI in a limited data set may not be used to contact subjects. Waivers of authorization are almost always granted for use of limited data sets in research.

Direct identifiers that must be removed from the information for a limited data set.	Identifiers that are allowed in the limited data set.
<ol style="list-style-type: none"> <li>1. name</li> <li>2. address information (other than city, state, and zip code)</li> <li>3. telephone and fax numbers</li> <li>4. e-mail address</li> <li>5. Social Security number</li> <li>6. certificate / license number</li> <li>7. vehicle identifiers and serial numbers</li> <li>8. URL's and IP addresses</li> <li>9. full face photos and other comparable images</li> <li>10. medical record numbers, health plan beneficiary numbers, and other account numbers</li> <li>11. device identifiers and serial numbers</li> <li>12. biometric identifiers including finger and voice prints</li> </ol>	<ol style="list-style-type: none"> <li>1. admission, discharge and service dates</li> <li>2. birth date</li> <li>3. date of death</li> <li>4. age (including age 90 or over)</li> <li>5. geographical subdivisions such as state, county, city, precinct and five-digit zip code.</li> </ol>