



De-Identified Data Sets and Limited Data Sets

The following chart describes the information that must be *eliminated* from a database, registry, or any other data set for the data set to be considered “de-identified” or a “limited data set”. Limited data sets may be disclosed for research, public health, and other limited purposes, but only to those who sign a “data use agreement” (available from the Privacy Director, IRBMED, or DRDA). Note that for each data element listed below, the information must be eliminated with respect to the patient *and* to any of the patient’s relatives, employers, or household members.

Important: Even if HIPAA does not regulate the use of a dataset or permits its use or disclosure for research, federal regulations and University policies governing human subjects research may still apply. Contact IRBMED for more information at irbmed@umich.edu.

Data Element	De-Identified Data Set*	Limited Data Set
Names	Remove	Remove
Address, city and other geographic information smaller than state. <i>3-digit zip code may be included in a de-identified data set for an area where more than 20,000 people live; use “000” if fewer than 20,000 people live there.</i>	Remove	Remove postal address information other than city, town, state or zip code.
All elements of dates (except year); plus age and any date (including year) if age is over 89. <i>Examples: date of birth, date of death, date of admission, date of discharge, date of service.</i>	Remove	May be included.
Telephone, fax numbers; e-mail addresses, web URL addresses, IP addresses.	Remove	Remove
Social security number, medical record number, health plan beneficiary number, any account number, certificate or license number.	Remove	Remove
Vehicle identifiers and serial numbers, including license plate numbers.	Remove	Remove
Device identifiers and serial numbers.	Remove	Remove
Biometric identifiers (e.g., fingerprints; voice prints). <i>DNA is not considered a biometric identifier for purposes of HIPAA.</i>	Remove	Remove
Full-face photographs and any comparable images.	Remove	Remove
Any other unique identifying number, characteristic or code.	Remove [†]	May be included.

* Even if all of the information listed in this column is removed, if the researcher knows that any remaining information in the data set could be used to re-identify a patient (e.g., a diagnosis code where the disease is very rare), then the data set is not considered de-identified.

† If links must be maintained in the data set for potential later re-identification, they must be completely unrelated to any of the above elements. For example, a patient’s initials or a scrambled social security number are not permitted. A subject code that reflects the order in which subjects were enrolled into a trial would be permitted.