

Guidance for Defining Identifiable Data

1. “Identifiable” means that the identity of a participant may be readily ascertained by the investigator or others. Examples of identifiable data include:

- Any data element which singly or in combination could be used to directly identify a participant, such as name, data of birth, social security number, or address (cf. 45 CFR 46.102(f)). The LU IRB uses the list HIPAA identifiers as a helpful guide (see below).
- Any combination of variables in a data set that might permit the indirect identification of a participant.
- Any element of the research design, such as timing or location, that may permit the incidental identification of participants.
- Any code linking a participant and their data.

2. Additional Considerations:

- IP addresses can be identifiers in certain cases, but only if determined to be so by the IRB in consultation with appropriate expertise.
- The HIPAA identifiers pertain specifically to Protected Health Information (PHI), but they serve as a helpful list of direct identifiers in the case of any research data:

Names	Account numbers;
All geographical 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: (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.	Certificate/license numbers;
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;	Vehicle identifiers and serial numbers, including license plate numbers;
Phone numbers;	Device identifiers and serial numbers;
Fax numbers;	Web Universal Resource Locators (URLs);
Electronic mail addresses;	Internet Protocol (IP) address numbers;
Social Security numbers;	Biometric identifiers, including finger and voice prints
Medical record numbers;	Full face photographic images and any comparable images;
Health plan beneficiary numbers;	Any other unique identifying number, characteristic, or code (note this does not mean the unique code assigned by the investigator to code the data)