

De-identified and Limited Data Sets

**Prepared by the
NCHICA Privacy and Security Officials Workgroup**

De-identified Data

A de-identified data set **may not include** any of the identifiers in List A or List B of the individual or of the individual's relatives, employers, or household members

List A

<ul style="list-style-type: none"> • Geographic subdivisions smaller than a state (i.e., county, city, town, precinct) • 5 or 9 digit Zip codes* • All elements of dates except year directly related to an individual, including birth or death or dates of health care services or health care claims 	<ul style="list-style-type: none"> • Specified ages 90 or above** • Any other unique identifying number, characteristic or code that could be used <u>by the researcher</u> to identify the individual***
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Notes:

*First three digits of ZIP codes are considered de-identified except for ZIPs starting with 036, 059, 063, 102, 203, 556, 692, 790, 821, 823, 830, 831, 878, 879, 884, 890, or 893, which roll up into ZIP='000'.

**Although a de-identified data set cannot contain a birth date, it may contain the individual's age expressed in years, months, days, or hours, as appropriate, except for individuals who are aged 90 years or more. For persons aged 90 years and above, the age in a de-identified data set can only be stated as being within the category of age 90 or above.

***A Re-Identification code is allowed for a de-identified dataset, but the code cannot be derived from any identifier in List A or List B (this effectively eliminates encrypted identifiers from being used).

Limited Data Set

A limited data set **may not include** any of the identifiers in List B of the individual or of the individual's relatives, employers, or household members. Note that a Limited Data Set **may include** the elements in List A.

List B

<ul style="list-style-type: none"> • Names • Any geocodes that identify an <u>individual household</u> such as street address or Post Office Box Number • Telephone numbers • Fax numbers • Electronic mail addresses • Social security numbers • Medical record numbers • Health plan beneficiary identifiers • Account numbers 	<ul style="list-style-type: none"> • Certificate/license numbers • Vehicle identifiers and serial numbers, including license plate numbers • Medical device identifiers and serial numbers • Web universal resource locators (URL) • Internet protocol (IP) address numbers • Biometric identifiers, including finger and voice prints • Full face photographic images
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