

Institutional Review Board
Penn State College of Medicine
Penn State Milton S. Hershey Medical Center

WHAT ARE THE 18 IDENTIFIERS?
Private health information (PHI) identifiable elements

The following is a list of informational elements that are considered to be *identifiers* according to HIPAA regulations, also known as private health information identifiable elements (PHI). These elements may be identifiers of the research participant or of the relatives, employers, or household members of the participant.

If these 18 identifiers are removed from the research, then the research is considered to be 'de-identified' and the HIPAA regulations do not apply**; however, IRB review is still required for the research.

** If all of the identifiers are removed the research, the health information may be used without having the participants sign an authorization from.

18 Identifiers

1. Names
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:
 - (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.
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
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 Locators (URLs)
15. Internet Protocol (IP) address numbers
16. Biometric identifiers, including finger and voice prints
17. Full face photographic images and any comparable images, and
18. Any other unique identifying number, characteristic, or code

Note: There is an exception process to obtain permission to use a '**Limited Data Set**' of identifiable elements of information, as explained in the separate document, How Does HIPAA Apply, on the IRB web site. (www.pennstatehershey.org/irb).