Decision Tool: Is my data *really* de-identified?

FSU College of Medicine

August 1, 2018

Does your data set include...

- □ Any parts of people's NAMES
- Any geographic subdivisions smaller than a state no street address, city, county or ZIP code*
- □ Any elements of dates (except year)**
- Any telephone numbers
- Any vehicle identifiers and serial numbers, including license plate numbers
- Any fax numbers
- Any device identifiers and serial numbers
- Any email addresses
- Any web Universal Resource Locators (URLs)
- □ Any social security numbers (SSN)
- Any Internet Protocol (IP) addresses
- Any medical record numbers
- □ Any biometric identifiers, including finger and voice prints
- Any health plan beneficiary numbers
- Any full-face photographs and any identifiable images
- □ Any account numbers
- Any other unique identifying number, characteristic, or code, except a re-identifier code
- Any certificate/license numbers

A single "Yes" to any of the above means that your data is **not de-identified** according to FSU and HHS

* except for the initial three digits of the 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

** for dates that are directly related to an individual including birth date, admission date, discharge date, death date, 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

Questions? Drop a line to the CoM Compliance Officer for a quick response! Denis Burns – denis.burns@med.fsu.edu (850) 644-3648