**Principal Investigator Certification**

**De-identified PHI**

Covered entities, including a researcher who is a covered entity, may use or disclose health information that is de-identified without Authorization or any other restriction under the Privacy Rule. De-identified health information, as described in the Privacy Rule, is not PHI, and thus is not protected by the Privacy Rule. This form should be completed when an investigator is using or disclosing deidentified PHI for research purposes. Data may be de-identified **by removing the below 18 elements** that could be used to identify the individual or the individual’s relatives, employers, or household members:

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, except as allowed in the following scenarios:
19. Re-identification. A covered entity may assign a code or other means of record identification to allow information de-identified under this section to be re-identified by the covered entity, provided that:
	* 1. Derivation. The code or other means of record identification is not derived from or related to information about the individual and is not otherwise capable of being translated so as to identify the individual; and
		2. Security. The covered entity does not use or disclose the code or other means of record identification for any other purpose, and does not disclose the mechanism for re-identification.

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| Project Title: |       |
| Principal Investigator: |       | Institution |       |
| Address/City/State/Zip: |       |
| Email address: |       | Phone: |       |
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| Please list the data elements requested in the de-identified data set and the source of that data:       |

As the principal investigator for this research study, I certify that the PHI received or reviewed by staff for this project does not include any of the identifiers listed above nor is a code used that could potentially link PHI to a research subject. I declare that the requested information constitutes the minimum necessary to accomplish the goals of the research. I certify that I do not have knowledge that any of the remaining information could be used, alone or in combination with other information, to identify an individual who is the subject of the information.

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Signature Date