

PRIVACY AND CONFIDENTIALITY

Unit: Human Research Protections Program (HRPP), Office of Research

Applies to: Faculty and Staff involved in human research

Identifiable Private Information: means information about a living individual that is used for research purposes and includes information about behavior that occurs in a context in which an individual can reasonably expect that no observation or recording is taking place, and information that has been provided for specific purposes by an individual and that the individual can reasonably expect will not be made public (e.g., a medical record). Under the OHRP regulations, identifiable private information must be individually identifiable (i.e., the identity of the research subject is or may readily be ascertained by the investigator or associated with the information) in order for the project to constitute research involving human subjects.

Individually Identifiable Information (health care): MCW Corporate Policies (AD.HP.010) defines this as Information that is a subset of health information, including demographic information collected from an individual, and:

- Is created or received by a health care provider, health plan, employer, or health care clearinghouse; and

- Relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual; and

- That identifies the individual; or with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

Sensitive Information: means identifiable private information or individually identifiable health care information relating to an individual's private activities or practices. Examples include: sexual preferences or practices; history of treatment for use/abuse of alcohol or drugs; information relating to a person's mental health history or treatment for mental illness or disease; HIV status; financial information such as social security numbers or private health insurance; or criminal history or background.

HIPAA: means the federal law known as the Heal

3. Investigators should describe when subjects' Social Security Numbers may be collected as part of the research. Collection and use of Social Security Numbers for the human subject research may be required in two situations; individual stipend payments or long term survival data such as the SSN Death Index.
 - a. In accordance with *MCW Corporate Policy: Business Purchases, Payments and*

automatically issued a COC through their award. Other Department of Health and Human Services (HHS) agencies issue COCs to researchers they fund. Researchers not funded by HHS can continue to apply to NIH or the FDA as
