Decision Tree for 2: Determining Pathway to Use PHI for Research

Use this decision tree to determine the appropriate pathway to access or use PHI in research. See Decision Tree 3 for use of PHI in recruitment activities.

1. Will you record any of the 18 HIPAA identifiers in your research records?
   - No: Submit a request to use De-identified Data with your IRB application.
   - Yes: Will you be interacting or intervening with a living individual?
     - No: Are all research subjects about whom data will be collected deceased?
       - Yes: Submit a Research with Decedents Form to ORSP.
       - No: Are you applying to the IRB for a waiver of consent or conducting exempt chart review research?
         - Yes: Apply to the IRB for a waiver of authorization.
         - No: Will all identifiers except geographic information above street level and dates be removed from the data?
           - Yes: Apply to the IRB for a Limited Data Set and submit a Data Use Agreement to ORSP with your IRB application.
           - No: Call ORSP for assistance.

2. Will you be interacting or intervening with a living individual?
   - Yes: Obtain signed authorization from each research participant to use or access PHI. Submit an authorization form or combined informed consent/authorization to the IRB for review and approval.
   - No: Are all research subjects about whom data will be collected deceased?
     - Yes: Submit a Research with Decedents Form to ORSP.
     - No: Are you applying to the IRB for a waiver of consent or conducting exempt chart review research?
       - Yes: Apply to the IRB for a waiver of authorization.
       - No: Will all identifiers except geographic information above street level and dates be removed from the data?
         - Yes: Apply to the IRB for a Limited Data Set and submit a Data Use Agreement to ORSP with your IRB application.
         - No: Call ORSP for assistance.