

Confidentiality (HRPP 3.3)

Description:

This policy describes UNMC's requirements for the maintenance of confidentiality of data.

Definitions:

Confidentiality: protecting data in order to ensure that it is not improperly divulged.

Protecting Confidentiality (protecting data):

The IRB is responsible for ensuring adequate provisions are in place to protect the confidentiality of data in all non-exempt research. The board will make the following determinations are appropriate:

- Safeguards and security measures are in place for the entry, storage, and transfer of data and are adequate
- There is adequate justification for sharing identifiable private information (IPI), and PHI is shared in a manner compliant with HIPAA and other regulations and laws, as applicable
- The minimum amount of IPI to complete the study is being obtained
- Access to IPI is restricted to the minimum number of people with legitimate need
- IPI will be appropriately and safely destroyed when it's no longer needed

Certificate of Confidentiality:

- Research funded (partly or wholly) by the NIH that involves IPI is automatically covered by an NIH Certificate of Confidentiality
- Research funded by the Centers of Disease Control and Prevention (CDC), Food and Drug Administration (FDA), Health Resources and Services Administration (HRSA), Indian Health Service (IHS), and Substance Abuse and Mental Health Services Administration (SAMHSA) may also have access to Certificates of Confidentiality through those agencies