How to conduct HIPAA compliant research with PHI at ASU

Will you receive PHI from a covered entity?

YES

Choose from options 1-5

1. Obtain Subject Authorization
   Use an authorization form that includes required HIPAA authorization language, see hyperlink for template.

2. Obtain an IRB waiver of subject authorization
   May be considered if the research is minimal risk to subjects and meets criteria for waiver, see hyperlink to FAQ.

3. Use a Limited Data Set
   PHI that excludes direct identifiers of the individual or of relatives, employers, or household members of the individual. Data Use Agreement may be required.

4. Use De-identified Data
   Health information that does not identify an individual and with respect to which there is no reasonable basis to believe that the information can be used to identify an individual.

5. Decedents
   Use or disclosure of decedents' PHI is acceptable without #1 or #2.

NO

HIPAA Authorization not required. IRB review may be required. Consult with IRB.