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**Institutional Review Board (IRB)**

- a Health Care Provider

14. Web universal resource locators (URLs).
15. Internet protocol (IP) address numbers.
16. Biometric identifiers, including fingerprints and voiceprints.
17. Full-face photographic images and any comparable images.
18. Any other unique identifying number, characteristic, or code, unless otherwise permi

# IRB A Checklist for Determining if HIPAA Applies to Your Research

Do you plan to collect health information directly?  yes  no  
If **yes**, HIPAA does NOT apply (45 CFR 46 does however)! Please refer to the IRB's website for more information.

Will you obtain health information from a covered entity?  yes  no  
If **no**, The HIPAA Privacy Rule does not apply.

Will the dataset contain any of the 18 HIPAA identifiers?  yes  no  
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If **yes**, HIPAA privacy authorization (IRB Form 6.1), waiver or alteration (IRB Form 6.3) and/or data use agreement (IRB Form 6.2) are NOT required. Other documents are needed (PHI Link 4).

Is this deidentified research?  yes  no  
If **yes**, HIPAA does not apply.

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permit the researcher to make these representations in written or oral form.



