Research Data Categories/HIPAA Non Covered Entity (NCE) /Covered Entity (CE)

Variable	#1 WVU PHI Sensitive • CE/NCE HIPAA applies • Data To/From MR • Data related to a Healthcare Event	#2 WVU Research PII Confidential • NCE – HIPAA does not apply • CE – HIPAA applies • Data cannot come from a MR/Healthcare Event		#3 WVU PII Sensitive Applies to CE/NCE
	From Medical Records/Healthcare Event (CE/NCE)	**PHI or RPII?** **CE = PHI** **NCE = RPII**	Always RPII (CE and NCE)	Always Sensitive (CE and NCE)
Name	✓	✓	✓	✓
Street Address (Number and Street Name)	✓	✓	✓	
City	✓	✓	✓	
County	✓	✓	✓	
Zip Code	✓	✓	✓	
Birthdate	✓	✓		
Date of Death	✓	✓		
Exact Age if Over 89	✓	✓		
Admission Dates	✓	✓		
Discharge Dates	✓	✓		
Surgery/Procedure Dates	✓	✓		
Medical Test Dates	✓	✓		
Email Addresses	✓	✓	✓	
Telephone Numbers	✓	✓	✓	
Fax Numbers	✓	✓	✓	
Medical Record Number/Patient ID	✓	✓		
Other Medical Record Info (Describe)	✓	✓		
Social Security Number	✓	✓	✓	✓
IP/MAC Address consistently linked to an individual	✓	✓	✓	
Medical Device Identifiers /Serial Numbers	✓	✓		
Web URLs	✓	✓	✓	
Biometric Identifiers (finger, voice print, etc.)	✓	✓	✓	✓
Full face photographic images and other comparable images	✓	✓	✓	
Health Plan Beneficiary Numbers	✓	✓		
Account Numbers (any type: insurance, bank, hospital bills, healthcare, etc.)	✓	✓	✓	✓
Professional Certificate/License Numbers	✓	✓	✓	
Vehicle Information (VIN/SN/License	✓	✓	✓	

West Virginia University
OFFICE OF HUMAN RESEARCH PROTECTIONS

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Plate/Title)				
Other unique identifying code or characteristic to be collected(tattoo, scar, physical impairment, amputee, website name)	✓	✓	✓	
Student Data (Personal, health, academic)			✓	
Mothers Maiden Name			✓	
Alias			✓	
Passport/Visa Numbers			✓	✓
Drivers License Number		.	✓	✓
Tax Payer ID			✓	
Credit Card Number			✓	✓
Financial PIN			✓	✓
WVU/HSC Employment Information			✓	
WVU/HSC/WVUM Authentication Credentials			✓	✓
Confidential Business Information (WVU/HSC)			✓	✓
Covered Defense Information			✓	✓
Information Subject to DoD Distribution Stmt B-F			✓	✓
Source Code- Export			✓	✓
Technical Data – Export			✓	✓
Technical Control Plans – Export			✓	✓
Trade Secrets (Institutional)			✓	✓
Variables, if checked with RPII, become RPII				
Place of Birth			✓	
Business Telephone Numbers			✓	
Business Mailing Address			✓	
Business Email Address			✓	
Race Religion			✓	