

SVSU IRB Policy & Procedures for Using SVSU Confidential Data

All research involving human subjects conducted in whole or in part by **any individual** acting on behalf of SVSU (e.g., full- or part-time employees, students, and volunteers) **regardless** of the physical location of the data collection, shall be submitted to the SVSU IRB for purposes of oversight and compliance with this policy. This requirement is binding whether the research is externally funded or not and regardless of the source of any such funding.

IRB Policy:

Any SVSU Employee or any data gathered on campus must use confidential information consistent with SVSU Information Policy and must refrain from unauthorized disclosure of non-public information concerning the University's activities. Employees must not misuse confidential information.

Definitions:

Confidential information generally consists of non-public information about a person or an entity that, if disclosed, could reasonably be expected to place either the person or the entity at risk of criminal or civil liability, or damage the person or entity's financial standing, employability, privacy or reputation. Confidential information includes but is not limited to:

- payroll records, salary and non-public benefits information
- Social Security numbers, driver's license numbers, state identification card numbers, passport numbers
- credit and debit card information, and financial account information
- personnel records, including but not limited to information regarding an employee's work history, credentials, salary and salary grade, benefits, length of service, performance, and discipline.
- individual criminal background check information
- individual conflict of interest information
- individually identifiable biometric information
- computer system passwords and security codes
- unpublished grant proposals and unpublished research data
- unpublished manuscripts and correspondence
- budgetary, departmental, or University planning information
- non-public financial, procurement, health/safety, audit, insurance and claims information
- internal investigation information, pre-litigation, and non-public litigation and administrative agency charge, audit and inquiry information
- student records, including but not limited to student education records within the meaning of the Family Educational Rights and Privacy Act
- proprietary or intellectual property in which the University asserts ownership that is created by University employees in connection with their work
- non-public law enforcement records generated or maintained by the SVSU Police Department
- all University attorney-client communications and University attorney work product
- non-public donor and alumni information
- patient care records including patient benefit plan enrollment, claims, billing matters, and data concerning human research subjects

SVSU IRB Policy on Research dealing with Conflict of Interest by Employees

- medical records, personally identifiable medical information, and all information designated as "Protected Health Information" under the Health Insurance Portability and Accountability Act (HIPAA), or otherwise protected by law
- all information, materials, data and records designated confidential by a University unit, by law or by contract, including information obtained by the University from third parties under non-disclosure agreements or any other contract that designates third party information as confidential

SVSU IRB Policy on Research dealing with Conflict of Interest by Employees

Use of Confidential Information for Research

Do you use or propose to use University Confidential Information (see above definitions) to conduct research or testing?

YES

NO

Under SVSU IRB policy, proposals for the use of University Confidential Information shall be reviewed by the Office of the Provost before Investigator can file IRB Application. Faculty and investigators are encouraged to seek guidance from Provost's Office even if their situation is not directly covered by the disclosure procedures in this policy.

Describe the **activity** and the **proposed use of Confidential Data in this Research.**