

# VAMHCS Research Data Inventory

## Privacy and Data Security Plan

**Date Submitted:**

**Principal Investigator:**

**Protocol Number: (IRB HP # or IACUC #)**

**Protocol Title:**

**Section 1 - Non-sensitive and Sensitive Data Use**

List the VA location(s) [Room and Building] where you will store **non-sensitive** study records. (Include location of electronic non-sensitive data as well).

**Select the VA Sensitive Information (VASI) use category (choose one)**

- This study does not collect or use any VASI **[Stop here]**
- This study uses but does not save, collect, copy, or record any VASI **[stop here]**
- This study does collect or record VASI **(Continue)**

**Section 2 - Hardcopy VASI**

Will VASI in hardcopy form be stored for this study (includes paper, tape recording, film, etc.)?

- Yes                       No

If yes, list the VA locations where you will store hardcopy VA Sensitive Information (VASI) for this study. Include the security measures such as in a locked cabinet inside a locked room when unattended.

**Section 3 - Electronic VASI**

Is VASI stored on the VA secure network (do not include CPRS)?

- Yes                       No

If yes, identify the locations (server name/folder etc).

Is VASI stored on a computer local hard drive (even temporarily) such as by specially obtained software?

- Yes                       No

If yes, identify the computer system and describe the sensitive data and how it is secured.

Will electronic VASI be stored outside of the VA secure network (such as in portable devices, on removable media, at another institution, or collected by external web application)?

- Yes                       No

If yes, describe the storage method (e.g., in a VA encrypted laptop) and security details, including the device/media location and ownership. Identify backup procedures for portable devices/media. If applicable, identify the web applications, their security features, the nature of the data involved, and the research purpose. Identify any agreements related to the protection of this data.

**Section 4 - Images**

Will images with personal identifiers (e.g. research [not clinical] records containing x-rays with patient names or record numbers) be used?

- Yes                       No

If yes, indicate where images with identifiers are stored

- In the medical record (e.g., VistA imaging)
- With the study secured hardcopy information
- With the study electronic sensitive information

**Section 5 - Photos with Faces or Recordings**

Will photos with faces or recordings are stored?

- Yes                       No

If yes, indicate where photos or recordings are stored

- With the study secured hardcopy information
- With the study electronic sensitive information

**Section 6 – Identified Biological Specimens**

Will biological specimens with subject identifiers (not code numbers) be stored?

- Yes                       No

If yes, indicate where they are stored and the security measures employed.

**Section 7 - Transporting and Sharing VASI**

Is VASI collected outside of the VA? *(Note: An approved Authorization to Transport will be required.)*

- Yes                       No

If yes, describe what is collected outside the VA and how it is secured in transit back to the VA

Is VASI transported outside of the VA for any purpose other than sharing (covered below)? *(Note: An approved Authorization to Transport will be required.)*

- Yes                       No

If yes, describe what is transported outside the VA, for what purpose, and how it is secured in transit

Can VASI be disclosed to monitoring/auditing agencies by HIPAA Authorization? *(Note: The Research Office must be notified when monitors come to audit)*

- Yes                       No

If yes, indicate the monitors/auditors that will have access by HIPAA Authorization

Will a copy of VASI be shared outside the VA for other purposes (e.g. collaborators or sponsors) by HIPAA Authorization?

- Yes                       No

If yes, describe what is shared, who receives a copy of VASI, and how it is secured in transit

Will a copy of VASI be shared or disclosed without HIPAA Authorization? *(This is rarely approved).*

- Yes                       No

If yes, describe what is shared, who receives a copy of VASI, and how it is secured in transit

**Section 8 - Use of Coded Data**

Will coded data that excludes personal identifiers be used? *(Note: Coded data excludes all HIPAA identifiers per VHA Handbook 1605.1 Appendix B, which includes dates)*

- Yes                       No

If yes, indicate where the code key is stored (choose one)

- With the study hardcopy VASI, but separate from the coded data
- With the study electronic VASI, but separate from the coded data
- Both of the above

**Section 9 - Any Other Relevant Details**

Add any other privacy or information security details here