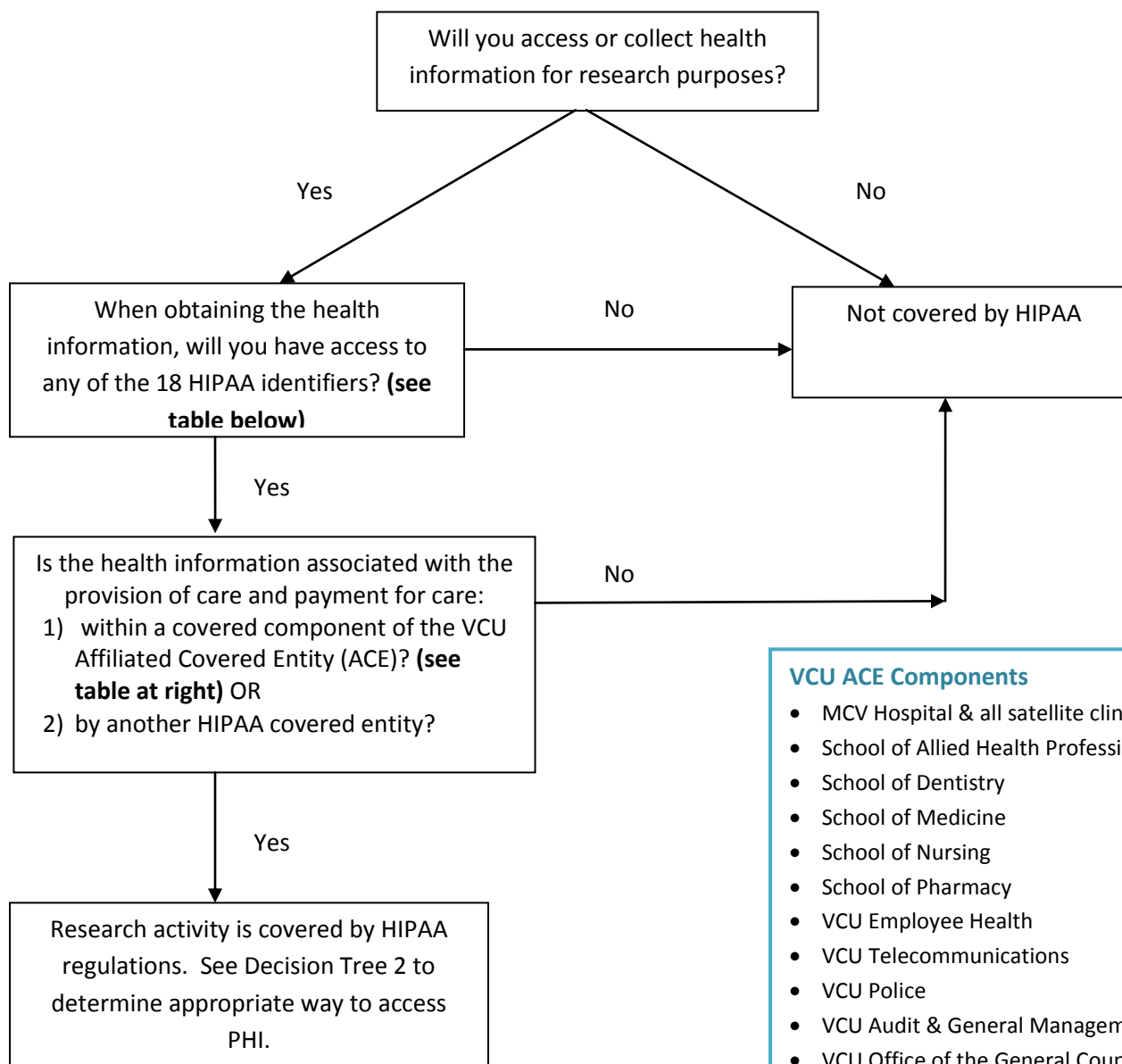# Decision Tree for 1: Determining When HIPAA Applies to Research

This decision tree should be used to determine if research must comply with HIPAA regulations.

Will you access or collect health information for research purposes?

Yes → | No →

When obtaining the health information, will you have access to any of the 18 HIPAA identifiers? (see table below) — No → Not covered by HIPAA

Yes ↓

Is the health information associated with the provision of care and payment for care:
1) within a covered component of the VCU Affiliated Covered Entity (ACE)? **(see table at right)** OR
2) by another HIPAA covered entity?

— No → Not covered by HIPAA

Yes ↓

Research activity is covered by HIPAA regulations. See Decision Tree 2 to determine appropriate way to access PHI.

VCU ACE Components
- MCV Hospital & all satellite clinics
- School of Allied Health Professions
- School of Dentistry
- School of Medicine
- School of Nursing
- School of Pharmacy
- VCU Employee Health
- VCU Telecommunications
- VCU Police
- VCU Audit & General Management
- VCU Office of the General Counsel
- VCU Office of the VP for Research

HIPAA Identifiers

Names	Social Security Numbers	Device Identifiers	Biometric Identifiers
Dates	Email Addresses	License/Certificate #s	Photos & Like Images
Postal Addresses	Medical Record Numbers	Vehicle ID numbers	Any other unique ID
Phone Numbers	Health Plan Numbers	Web URLs	
Fax Numbers	Account Numbers	IP Address Numbers	