

Checklist for Proposed Disclosure of SSNs Outside of UNA

If a research protocol proposes to disclose SSNs outside of UNA, the PI should address the following items in a supporting document attached to the protocol submission. The reasons why SSNs are needed should be included in the protocol, regardless of whether disclosure outside of UNA is proposed. Whether there is an alternate method to satisfy the goal that collection of SSNs satisfies, even if that method is less desirable or more burdensome, should also be specifically addressed.

1. Why is it necessary to disclose SSNs outside of UNA? Specifically address whether there is an alternate method to satisfy the goal that the disclosure of SSNs satisfies, even if that method is less desirable or more burdensome.
2. To whom or to what institution or facility will SSNs be disclosed?
3. By what method will SSNs be transmitted? Specifically address security precautions that will be utilized; e.g., encryption measures for electronic data, courier or delivery service confidentiality procedures.
4. Provide a copy of the data security plan at the recipient destination and evidence of approval of the plan by the recipient institution's IRB.
5. Provide a data use agreement signed by the recipient institution that includes the following items:
 - a. To use the SSNs only for the stated purpose;
 - b. To not release the SSNs to any person or organization without prior written approval by the UNA HSC;
 - c. To not permit copies of the files to be made;
 - d. To maintain the file(s) containing the SSNs only in the secure environment(s) authorized in the data security plan for the recipient organization's IRB approved protocol for the research;
 - e. To destroy the file(s) containing the SSNs when the research is completed;
 - f. To inform the UNA HSC and the UNA PI immediately if there is any security breach of the SSNs.

The consent form must explicitly state that SSNs will be disclosed outside of UNA, to whom, and the confidentiality protections that are in place.