



HRP-333 | 2/2/2024

## WORKSHEET: Certificate of Confidentiality

The purpose of this worksheet is to provide support for the convened IRB or Designated Reviewers when evaluating whether a Certificate of Confidentiality is required or appropriate for a study.<sup>1</sup>

### 1. Considerations for Certificate of Confidentiality (Check if “Yes”)

- ☐ The research is funded by the National Institutes of Health (NIH) and is biomedical, clinical, or other research.<sup>2</sup> If “Yes,” a CoC is automatically issued through the award. Other HHS agencies provide a CoC for funded research upon request.<sup>3</sup>
- ☐ The research is health-related biomedical, behavioral, clinical, or other research that is not funded by HHS.<sup>4</sup>  
If “Yes,” answer the following:
  - ☐ The research is collecting personally identifiable information.
  - ☐ The research is sensitive.<sup>5</sup>
  - ☐ The research is collecting information that if disclosed could significantly harm or damage the participant.

### 2. Certificate of Confidentiality for Research Language is included in Consent (If “Yes” in #1, must be “Yes”)

- ☐ The consent document includes information describing the CoC and its purpose and its applicability to the research.

<sup>1</sup> This document satisfies AAHRPP element II.3.E

<sup>2</sup> NOT-OD-17-109: Notice of Changes to NIH Policy for Issuing Certificates of Confidentiality;  
<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-17-109.html>

<sup>3</sup> To identify appropriate HHS agency for CoC request; <https://grants.nih.gov/policy/humansubjects/coc/how-to-apply.htm#step1>

<sup>4</sup> Online Certificate of Confidentiality System; <https://public.era.nih.gov/commonsplus/public/coc/request/init.era>

<sup>5</sup> Examples of sensitive research activities include but are not limited to the following: collecting genetic information; collecting information on psychological well-being of subjects; collecting information on subjects’ sexual attitudes, preferences, or practices; collecting data on substance abuse or other illegal risk behaviors’ studies where subjects may be involved in litigation related to exposures under study (e.g., breast implants, environmental or occupational exposures).