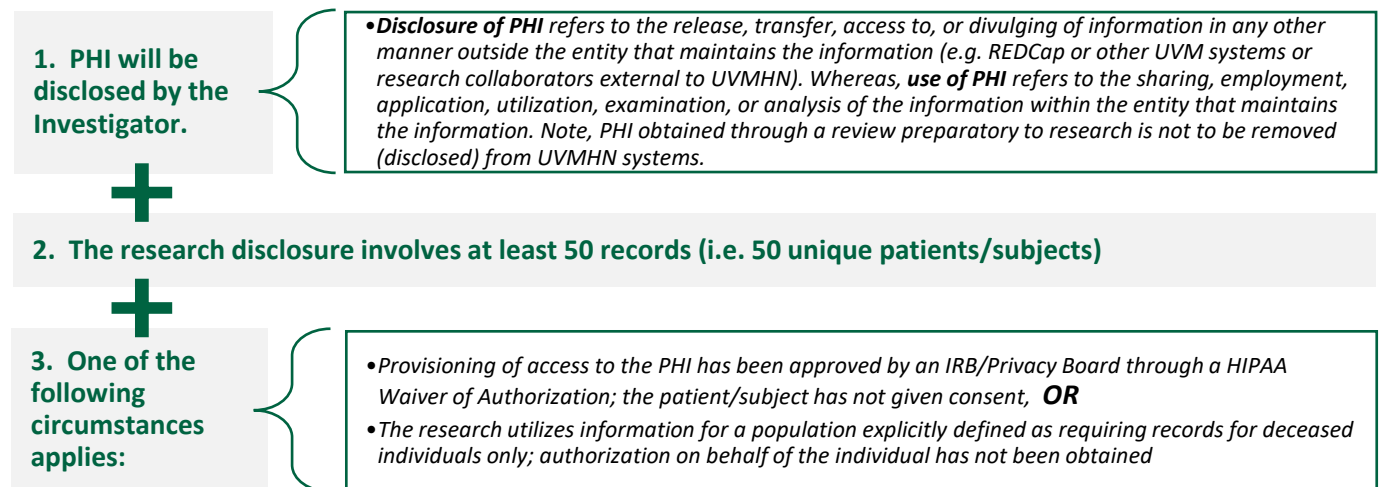


## ACCOUNTING OF DISCLOSURES OF PROTECTED HEALTH INFORMATION (PHI)

The Privacy Rule issued under HIPAA (Health Insurance Portability & Accountability Act) requires that investigators conducting a research study that utilizes PHI must account for all disclosures of PHI when specific criteria apply. HIPAA's Privacy Rule requires that there must be an accounting of each disclosure including repeated disclosures; this is relevant for each initial study and any study modification that expands the content or amount of PHI being disclosed when all three of the following criteria apply to a research study:



**IF ALL THREE OF THE CRITERIA ABOVE APPLY TO YOUR RESEARCH STUDY, PLEASE COMPLETE THE SECTION BELOW.**

Select the one that applies to your study:      *HIPAA Waived Research*      *Research on Decedents*

Provide the following information:

1. Study Title:
2. IRB Study Number:
3. Actual or approximate Date of disclosure, frequency of disclosure (e.g., quarterly, annually), and/or number of disclosures within a specified period:
4. Name, email address, and phone number of Person Making the Disclosure:
5. Name, email address, and phone number (if known) of the entity or person who received the PHI:
6. Name, email address, and phone number (if known) of the entity that sponsored the research (if applicable):
7. Description of the PHI disclosed (i.e. direct & indirect identifiers as defined by HIPAA):
8. A brief statement of the purpose of the disclosure, including a plain-language description of the research protocol, purpose & objectives of the research, and criteria for selecting the study population/records:

Email this completed form to [DataGovernance@UVMHealth.org](mailto:DataGovernance@UVMHealth.org) to ensure compliance with HIPAA & UVMHN policy.