

# University Physicians Inc.



## RESEARCH REQUESTS FOR PHI POLICY

**Latest Revision:**

**Original Effective Date: April 4, 2003**

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**Purpose** The purpose of this policy is to outline appropriate disclosures of PHI when requested for the purpose of research.

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**Policy** No member of the UPI workforce will disclose PHI when requested for the purpose of research until they have received documentation supporting COMIRB approval for such a request. All research requests and COMIRB documentation will be reviewed and approved by the Privacy Officer to verify compliance with HIPAA.

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**Procedure** All research requests for PHI should immediately be directed to the Privacy Officer. The Privacy Officer will review the request and approve prior to release of PHI.

Formal documented approval from COMIRB will be required prior to consideration and review by UPI. UPI shall rely on the professional expertise of the Institutional Review Board to assess appropriateness of PHI usage.

Disclosure of PHI for the purpose of research will be documented and logged by the Privacy Officer and a retained for a period of time no less than six (6) years.

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**Definitions** See glossary for key terms and acronyms used in this policy.  
(On file with Privacy Officer)

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**Enforcement** Enforcement of this policy will reside with the Privacy Officer or appropriate Management.

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**Rationale/  
Source** This policy complies with requirements of the following:

- Health Insurance Portability and Accountability Act (HIPAA), Privacy Rule

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**Cross  
References** For additional information, refer to the following:

Document Name

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**Review or  
Revision Date**

This policy is reviewed and approved annually, and as revised.

MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY	MM/DD/YYYY

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**Governance**

Responsibility for adoption and/or implementation of this policy is as follows:

<b>Approving Body</b>		<b>Executive Approval</b>	
<b>Privacy Officer:</b>	<b>04/04/03</b>	<b>Chief Operating Officer:</b>	<b>04/04/03</b>
<b>Signature on file.</b>	<b>Date</b>	<b>Signature on file.</b>	<b>Date</b>