

Health Care Privacy Compliance Handbook, 3rd Edition

4—Appendix F: Sample Tracking Form for Accountings of Research Disclosures (Fewer than 50 Individuals)

Instructions: Use this form to track disclosures to an individual or entity *outside of [Covered Entity]* of protected health information (PHI) for purposes of research where individual participant HIPAA authorization is not obtained. For example, this form must be used when PHI is disclosed:

- Preparatory to research
- Pursuant to an Institutional Review Board waiver of HIPAA authorization

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