

Health Care Privacy Compliance Handbook, 3rd Edition 4—Appendix G: Sample Tracking Form for Accountings of Research Disclosures (50 or More 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

| Number of Individuals Affected by Disclosure | |
|--|---|
| Date or Date Range of Disclosure | - |
| Research Sponsor Name | |
| Research Sponsor Address | |
| Research Sponsor Telephone | |
| Recipient Researcher Name | |
| Recipient Researcher Address | |
| | |
| Recipient Researcher Telephone | |
| Name of Research Protocol or Activity | |

| Description of Research Protocol or Activity | |
|---|--|
| | |
| Purpose of the Research | |
| Criteria for Selection of Particular Records | |
| | |
| Description of PHI Disclosed | |
| | |
| Purpose of Disclosure (may attach a copy of Institutional Review Board research approval) | |
| | |

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