

University Medical Center
Tucson, Arizona 85724
Compliance Department Procedure
Use and Disclosure of Patient Data Lists for Research

The use and disclosure of PHI for research (those activities which require IRB approval) will be done in accordance with the HIPAA privacy and security rules. This procedure addresses the processing of requests for lists of patient data to be used either for (1) activities to prepare for research or (2) retrospective chart reviews.

PROCEDURE:

1. Requests for lists of patient data are to be directed to the UMC Corporate Compliance Officer/Privacy Officer for approval. If the data is to be de-identified, a Data Use Agreement will be processed (see [Requests for Limited Data Sets](#) form). If the data needs to contain patient identifiers including name, medical record number etc., the request will be processed in the following manner.
2. Authorization for such requests will be given only when a copy of the IRB approved waiver of authorization is submitted by the principal investigator to the UMC Corporate Compliance Officer.
3. If a request for a patient data list is received but the principal investigator (PI) has not obtained an IRB waiver of authorization, the PI will be directed to obtain one before the request is further considered by UMC.
4. Once UMC receives a copy of the letter of approval for a waiver of authorization from the PI, the Corporate Compliance Officer/Privacy Officer will refer the request to the most appropriate department to generate the data list e.g. Information Systems Services, Quality Improvement, Health Information Management, Ancillary Department such as Laboratory or Radiology etc.
5. If there will be a significant delay in generating the requested data list or there is a valid reason for not being able to generate the requested list, the PI will be notified by the Corporate Compliance Officer

References:

1. UMC Policy PP 21 Use and Disclosure of Protected Health Information in Research
2. HIPAA and the Common Rule: Handling Health Information in Research, Kristin N. Rosati, Esq. 2006