

Lifespan-wide Policy

Subject:

File Under:

**LIFESPAN POLICY
AFFILIATE STAFF AND
MEDICAL STAFF:**

**USE AND DISCLOSURE OF
PROTECTED HEALTH
INFORMATION
FOR RESEARCH
PURPOSES**

Issuing Department:

Latest Revision Date:

Original Procedure Date:
March, 2003

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Approved By:

(Director)

(Executive)

SCOPE OF POLICY

This policy applies to all Lifespan affiliate staff members and medical staff members. Affiliate staff members include all employees, medical or other students, trainees, residents, interns, volunteers, consultants, contractors and subcontractors at the affiliates. Medical staff members include physicians as well as allied health professionals.

STATEMENT OF POLICY

Protected health information obtained by the affiliate may *not* be used internally or disclosed to any persons or organizations outside the hospital for research purposes without the prior approval of the affiliate's designated Institutional Review Board (IRB). All persons requesting access to protected health information for research purposes should be directed to submit his or her request to the IRB. The IRB will be responsible for ensuring that strict policies and procedures regarding the access, use, and disclosure of protected health information for research purposes are followed. This means that no research may be conducted by any affiliate staff, medical staff, or any other persons on the premises without the prior approval of the IRB.

VIOLATIONS

The affiliate's designated IRB has general responsibility for implementation of this policy. Members of the affiliate staff and medical staff who violate this policy will be subject to disciplinary action up to and including termination of employment or contract with Lifespan. Anyone who knows or has reason to believe that another person has violated this policy should report the matter promptly to his or her supervisor or the Lifespan Privacy Officer. All reported matters will be investigated, and, where appropriate, steps will be taken to remedy the situation. Where possible, Lifespan will make every effort to handle the reported matter confidentially. Any attempt to retaliate against a person for reporting a violation of this policy will itself be considered a violation of this policy that may result in disciplinary action up to and including termination of employment or contract with Lifespan (see Lifespan policy CCPM 53.)

QUESTIONS

If you have questions about this policy, please contact your department supervisor or the Lifespan Privacy Officer immediately. It is important that all questions be resolved as soon as possible to ensure protected health information is used and disclosed appropriately.