



Research – Accounting of Disclosures

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Use vs. Disclosure

- OHSU – Covered Entity (CE)
- OHSU – Not Hybrid CE
- Use: IHI sharing, employment, application, utilization, examination or analysis of OHSU information within OHSU
- Disclosure: release, transfer, provision of, access to, or divulging in any manner of OHSU information outside of OHSU

No accounting required

- Treatment, Payment, or Health Care Operations
- Disclosures to the individual
- *Authorized by the patient/subject*
- *Limited Data Set with Data Use Agreement*
- Disclosures related to facility directory
- To correctional institutions or law enforcement officials with custody

Accounting Required?

- Preparatory to research to:
 - Prepare research protocol
 - No PHI removed from OHSU
 - PHI is necessary for the research purpose
- Research on decedent's information
 - Use solely for research
 - Able to produce documentation of death
 - PHI necessary for the research purpose
- Waiver
 - Alteration to authorization
 - waiver, in whole or in part, of authorization