Title: HIPAA Live Research Clinical Studies PHI

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Date Adopted:

02/01/18

Date(s) Revised:

Date(s) Reviewed: 09/29/2020

09/29/2020

President

Date

POLICY STATEMENT

The following policy addresses PHI or Sensitive Information created during live research clinical studies.

SCOPE

All personnel.

DEFINITIONS

<u>Personnel:</u> Includes, but is not limited to, all employees, medical and clinical staff, business associates, allied health professional staff or students, vendors, volunteers, excluding patients and visitors.

<u>PHI:</u> Individually identifiable health information, including patient demographics, that is created or received by a provider and identifies the person and relates to his or her past, present, or future physical or mental health, treatment, and/or payment, except for information relating to persons who have been deceased for more than fifty (50) years.

<u>Sensitive Information</u>: Data that is proprietary to NUHS and is not intended to be disclosed to the general public.

PROCEDURE

 Clinical studies represent important scientific work and present learning opportunities for residents, interns and students. Clinical studies conducted in the Clinical Studies Offices (Rooms 409A and 409B) utilize computers connected to the NUHS network during active studies.

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 Following use of the PHI during live studies, the material is deleted from the computer and stored as required under HIPAA on network resources or in paper format. If stored in paper format, the policies applicable to secure storage of paper records shall apply.

POLICY RESPONSIBILITY

HIPAA Security Officer

REVISION

NUHS reserves the right to unilaterally revise, modify, review or alter the terms and conditions of the policy within the constraints of law, with or without reasonable notice.