Reviews Preparatory to Research (Form)

In accordance with the HIPAA Privacy Rule, Rowan University School of Osteopathic Medicine (Rowan Medicine) may use or disclose Protected Health Information (PHI) for the purpose of ‘Reviews Preparatory to Research’ (RPR), wherein a researcher uses/reviews PHI for the purpose of developing a research protocol; formulating a research hypothesis; or to screen for study eligibility.

Under the ‘Reviews Preparatory to Research’ (RPR) mechanism, Rowan Medicine may release PHI to a Researcher without an individual’s HIPAA Authorization or a Waiver of HIPAA Authorization granted by the Privacy Board. However, the law requires that Rowan Medicine obtain from the Researcher the attached RPR Form to ensure privacy and confidentiality of the PHI being released.

Procedures

1. Researchers who are members of Rowan Medicine may utilize PHI of Rowan Medicine obtained through the RPR to contact patients for recruitment activities.
2. At no time during the review will the information be removed from Rowan Medicine premises.
3. Special Note on Reviewing PHI for Recruitment Purposes. Researchers may use PHI obtained pursuant to this Review Preparatory to Research procedure to contact potential study subjects subsequent to receiving Rowan Medicine-IRB approval for the study protocol. At no time you nor your staff will contact patients about the proposed study or conduct any research until you submit and receive the approval for the human subject protocol from Rowan Medicine, but only after IRB approval of the study has been obtained.
4. Researchers who are not members of Rowan Medicine may utilize the PHI of Rowan Medicine obtained through the RPR for recruitment only upon obtaining IRB approval of the study and obtaining a HIPAA Partial Waiver of Authorization from the IRB/ Privacy Board.
5. At Rowan Medicine, the IRB serves as both HIPAA Privacy Board and the IRB.
6. The HIPAA Privacy Officer at Rowan Medicine verifies that the completed RPR Form is in compliance with the Standard Operating Procedure. If changes are required, the HIPAA Privacy Officer advises the Researcher of the changes needed. If no changes are required, the HIPAA Privacy Officer signs and dates concurrence and returns the RPR Form to the Researcher and retains a copy in the office. Signed RPRs will be reported to the Privacy Board.
7. The review of PHI will commence on the date of approval of the RPR Form and will expire on the date specified in the Certification Form. After the expiration date, you will no longer access the PHI for research preparation and will retain the PHI in accordance with the policies on human subject research, only if needed as part of an approved research protocol from Rowan Medicine IRB.
For additional Information, please contact the HIPAA Privacy Office at:

Ray Braeunig, CHC, CHPC, CHRC
Chief Compliance & Privacy Officer
Office of Compliance & Corporate Integrity
42 E. Laurel Road
Rowan Medicine Building - Suite 1300
Stratford, NJ 08084
856-566-6136

Reference: 45CFR 164.512(i)(1)(ii)