**Rowan University**

**Privacy Program for Human Subject Research – Policies and Procedures**

**Subject: Human Subject research**

**Effective date: August 1, 2013**

1. POLICY

 Rowan University (“Rowan”) authorizes its Institutional Review Board, (“IRB”), to function as a privacy board in order to implement the protections of the Health Insurance Portability and Accountability Act, (“HIPAA”). Accordingly, Rowan’s IRB will review submissions to determine that subjects participating in research involving access to protected health information (“PHI”) authorize the release of such information in a manner consistent with the requirements of HIPAA. In those limited situations allowed by HIPAA, the IRB may waive the requirement for such authorization.

1. PROCEDURES

Medical Authorizations: In their submissions to the IRB, including protocols for continuing review, Principal Investigators will incorporate authorizations for the release of PHI in consent forms for participation in research involving human subjects.

 Waivers: The IRB will determine and document whether requests for waiver of individual authorizations conform to the requirements of HIPAA.

 Activities Preparatory to Research: Pursuant to HIPAA, the IRB will determine and document the appropriate parameters for protocols involving access to PHI during activities preparatory to research, which parameters include a prohibition against removing the PHI from the covered entity.

 Research Involving Decedents: From the PI’s representations, the IRB will determine whether the research involves decedents and, if so, whether the research has the potential to impact living individuals.

1. RESOURCES

 Rowan maintains a website about research which covers HIPAA and includes frequently asked questions and policies provided by the Office of Civil Rights.

 Rowan offers comprehensive web-based training programs about IRB and HIPAA to inform and train researchers and their staff.

Contacts at Rowan University:

**Privacy Office**

Ray Braeunig, CHC, CHPC

Chief Compliance & Privacy Officer

RowanSOM

**IRB Office**

Eric Gregory

Director of Research Compliance

Patricia Gessner, CIM

Program Assistant