

PROCEDURE FOR COMPLETING ACCOUNTING OF DISCLOSURE FORM FOR RESEARCH

1. **OBJECTIVE:** Outline procedures for creating and submitting the Accounting of Disclosure Form for Research
2. **RESPONSIBILITIES:** The Principal Investigator (PI) and/or designee ensure that the Accounting of Disclosure Form is accurately completed for all applicable research projects. The Accounting of Disclosure Form must be sent to the Release of Information Office (ROI) at least every 60 days.
3. **PROCEDURES:**
 - a) Complete the Accounting of Disclosure Form for Research
 - i. Obtain Accounting of Disclosure Form from Aref website at atlaref.org.
 - ii. Create a separate Accounting of Disclosure Form for each research study
 - iii. Complete header with VA Principal Investigator's name, study title, and VA contact number.
 - iv. Enter each study subject whose PHI is disclosed to non-covered entity(ies) for that project (This does not pertain to non-Veteran study subjects)
 - v. Enter last four numbers of social security number of each study subject
 - vi. Enter date of PHI disclosure to non-covered entity (ies). Multiple entries in a box are acceptable.
 - vii. Describe what information was disclosed: for example, "visit 1 study data"
 - viii. Enter "research" in Purpose of Disclosure box
 - ix. Enter name(s) of study staff who disclosed the information
 - x. Enter how information was disclosed: for example, fax, phone, electronic data entry.
 - xi. Enter name(s) of non-covered entity (ies) (outside organization) as well as a contact person at each one
 - xii. Enter address and phone number of each entity-organization
 - xiii. Send form to the ROI at least every 60 days for each study
 - b) Send the Accounting of Disclosure Form to the Release of Information Office (ROI) by:
 - i. **Encrypted** email to leroy.jordan@va.gov. Please cc: rhonda.wise@va.gov (preferred method) **OR**
 - ii. Deliver a copy of this form to the Clinical Studies Center (CSC), Room 11C119. Place in secure VA envelope and place in scanning request drop box. Please note: this form is NOT scanned into CPRS
 - c) Keep a copy of this document and place it in the research study binder