



CHS data warehouse/analytic caregiver accesses patient medical records (part of his/her CHS job duties)

Physician/nurse/study coordinator accesses patient medical records - does not matter whose patients they are

Collected Information is de-identified before release to requestor

Information released to requestor includes PHI (minimum necessary)

PHI is viewed and/or collected [minimum necessary]

No Prep to Research Representation necessary - requestor is not using PHI  
Data-identified data may be shared externally (no accounting necessary)

Waiver of Authorization approved by IRB  
PHI may be disclosed to a non-CHS Workforce member (either viewed within CHS or PHI sent outside of CHS)

Prep to Research Notification submitted to IRB  
PHI may be disclosed to a non-CHS Workforce Member when viewed within CHS

Waiver of Authorization approved by IRB  
PHI may be disclosed to a non-CHS Workforce member (either viewed within CHS or PHI sent outside of CHS)

Prep to Research Notification submitted to IRB  
PHI may be disclosed to a non-CHS Workforce Member when viewed within CHS

An accounting of disclosure must occur