

Data Analytic Core Privacy Policies

Authority and Purpose

1 Overview

The Dartmouth College Committee for the Protection of Human Subjects (CPHS) serves as the Institutional Review Board (IRB), which has authority for determining the collection, use, maintenance, and sharing of PHI/PII in support of research projects using secure Information Systems in the Data Analytic Core.

2 Designated Authority

The CPHS office coordinates with the Dartmouth College Office of Sponsored Projects, the Dartmouth College Office of General Counsel, and reports to the Office of Institutional Research where the Vice Provost for Research serves as the Dartmouth College Institutional Official for Human Subjects. Upon IRB approval by CPHS, the Director of the Data Analytic Core is the senior privacy official specific to the use of Information Resources held in the DAC Information System.

3 Roles and Responsibilities

Each research project engaging with Information Resources held in the Data Analytic Core Information System is required to have an IRB review through the CPHS office. The role of CPHS is to determine if the research project meets the federal definition of research: *"a systematic investigation including research development, testing and evaluation, designed to develop or contribute to generalizable knowledge."*

CPHS requires researchers:

1. To conduct research according to ethical principles, federal regulations, and internal procedures.
2. To ensure participants are informed prior to enrollment and that communication continues throughout the study.
3. To protect the rights and welfare of human research participants.
4. To keep Co-investigators and all research staff informed about the nature and goals of the project.
5. To obtain CPHS approval for revisions prior to initiation.
6. To report progress in a continuing review of approved research to the CPHS Office at least once a year.
7. To report to the CPHS any serious injuries or other unanticipated problems involving risks to participants or others.

CPHS reviews each project to ensure that potential participants are provided with sufficient information to make informed choices about either beginning or continuing participation in research. The process involves a dynamic and continuing exchange of information between the research team and the participant throughout the research experience. The consent form is a tool to assist the researcher.

4 Purpose

The purpose of the DAC Privacy program is to protect the privacy contained in the Information Resources held in the DAC Information System through a privacy program. The plan includes:

- a. A description of the structure of the privacy program;
- b. Resources allocated to the privacy program;
- c. The role of the Senior Official in the DAC privacy program;
- d. The strategic goals and objectives of the privacy program; the controls in place to meet applicable privacy requirements and manage privacy risks;

4.1 Goals of the DAC Privacy Plan

1. Demonstrate a culture of privacy through leadership and partnerships.
2. Provide an up-to-date education and training program on the importance of privacy protection.
3. Engage in consistent oversight of research projects to ensure compliance with federal privacy laws.
4. Develop and nurture professional human capital in the DAC ensure the ability to respond and prioritize adherence to the DAC privacy program.