

Data Analytic Core Privacy Policies

Individual Participation and Redress

1 Consent

Through the IRB review coordinated by the DAC, 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. Most research projects engaging with large administrative claims datasets are exempt from being required to obtain individual consent.

1.1 Mechanisms supporting itemized or Tiered Consent

CPHS and DAC implement mechanisms to support itemized or tiered consent for specific uses of data where applicable. Most research projects engaging with large administrative claims datasets are exempt from being required to obtain individual consent.

2 Individual Access

The DAC, where applicable:

- a. Provides individuals the ability to have access to their PHI/PII maintained in its system(s) of records;
- b. Publishes rules around how individuals may request access to records maintained in the DAC Information System;

Since the DAC removes obvious identifiers (i.e. social security number and name) and the only identifiers in the data are unique beneficiary IDs generated by CMS, the DAC would refer all requests to CMS for access to PHI/PII that originated from CMS.

3 Redress

The DAC:

- a. Provides a process for individuals to remedy any inaccurate, incomplete, or out-of-date PHI/PII maintained by the DAC Information System. Where the inaccuracy involves CMS data, the DAC defers to CMS for correcting the data to reflect the changes and records these changes through version control.
- b. Individual will be notified of the change(s).

4 Complaint Management

The DAC implements a process for receiving and responding to complaints, concerns, or questions from individuals about its privacy practices on its website under the Privacy Policies.

5 Response Times

The DAC:

- a. Will respond to complaints, concerns, and questions within a reasonable timeframe of no less than 10 days from when the complaint, concern, or question is received.
- b. The DAC will review requests within 30 working days of receipts, unless there are unusual circumstances that preclude completing the review within that time frame;
- c. Will respond to any appeal as soon as possible, but no later than 30 working days after receipt of the appeal unless there is good cause.