

USE. PURCHASE OF HARDWARE, SOFTWARE, AND APPLICATION SERVICE PROVIDERS (ASP's) THAT REQUIRE PRE-APPROVAL

	SOPs and data protections
Purchase of new hardware (new to HPHC)	
To be connected to HPHC systems	(1,2)
Never connected to HPHC systems	(2)
Purchase of new third-party software (new to HPHC)	
To be run on HPHC systems	(1,2)
Never connected to HPHC systems	(2)
Development of software under contract	
To be run on HPHC systems	(3)
Use of application service providers	
Sensitive or confidential data going to ASP	(4)
No confidential data but concern about ASP's representation of HPHC/I	(4)
No confidential data going to ASP and no concern re: unauthorized access	no additional review
HPHC member and/or employee data	
Obtained directly from HPHC department, not from RSDC	(5)
(1) Reviewed and approved in advance by IT and OIS (2) Obtained by HPHC purchasing (3) Requires ad hoc IT security review (4) OIS obtains "Security Requirement Template for ASPs" from vendor and remote security vulnerability scan performed (5) Privacy and Security VET (Virtual Extract Team)	

TECHNOLOGY RESEARCH

Standard Source of data	PHI, PI beyond LDS	Only PHI allowed in LDS or no PHI	No PHI, PI	SOPs and data protections*
HPHC direct member contact or access to identifiable data	X			(1,2,3,4)
HPHC member contact by Business Associate (e.g., survey firm)	X			(1,2,3,4)
HPHC claims (member-level data in a Limited Data Set)		X		(1,2,3,4)
HPHC claims and MA Cancer Registry data		X		(1,2,3,5)
Multi-institutional distributed data project, HPHC members, access to statistical output or aggregate data only			X	(1,2,6)
Aggregate data from HPHC claims to external partner (e.g. Cancer Counter)			X	(1,2,4,6)
Local delivery system partner (e.g., HVMA/Atrius, CHA), direct patient contact or access to identifiable data	X			(1,3,4)
Local delivery system partner (e.g., HVMA/Atrius, CHA), EMR/claims		X		(1,3,4)
HPHC and HMORN partner, direct member contact, HPHC lead	X			(1,2,3,4,7)
HPHC and HMORN partner, direct member contact, partner lead	X			(1,2,3,8)
HPHC and HMORN +/- federal (e.g., CDC, FDA) partner, EMR/claims, HPHC lead		X		(1,2,3,4,7)
HPHC and HMORN +/- federal (e.g., CDC, FDA) partner, EMR/claims, partner lead		X		(1,2,3,8)
Medicaid, Medicare claims		X	X	(1,4,9)
Institutional, provider, or patient survey by HPHCI investigator	X	X		(1,4)
Limited access national survey data (e.g., MCBS, HRS)			X	(1,4)
Publicly available deidentified survey data (e.g., BRFSS)			X	(1,4)
International partner (WHO, health delivery system), deidentified data			X	(1,4,10)

SOP's AND DATE PROTECTION*

(1) Research complies with all HPHC policies, including approval by HSC and other institutional IRBs as needed	(6) No reporting in crosstabulations of any cells with patient counts <6.
(2) Research involving HPHC members approved by HPHC Privacy Board (Minimum Necessary criterion, HIPAA waiver if needed)	(7) HMORN partner data sometimes stored on HPHC systems; restricted to study team with no outside access
(3) Business Associate Agreement and/or DUA or DCA in place prior to release of PHI	(8) HPHC data sometimes stored on partner systems with no outside access
(4) Data stored in password-protected folders on HPHC systems; restricted to study team with no outside access	(9) Data stored on federally-approved data intermediary; only deidentified data on HPHC systems with no outside access
(5) Study approval obtained in advance from MA Cancer Registry Research Committee	(10) HIPAA regulations do not apply; studies meet all privacy and