CMS Policy

Institutional Policy

Title:	CMS Policy
Responsible Officer:	Director, Research Informatics
Original Effective Date:	3/6/2014
Revised Date:	2/8/2019
Renewal Date:	On or before 2024
Approved By:	*Kathryn Tasker*

Table of Contents

1 Purpose

The purpose is to provide an inclusive list of underlying policies applicable to CMS engagements.

2   Scope

This policy applies to all principal investigators and all named persons on an data sharing or data use agreements with CMS (Center for Medicare Services) to use sensitive existing data or working under the direction of an HSL employee named on an Agreement to use sensitive existing data.

3   Definitions

Term: Sensitive Data

Any data which contains Social Security Numbers or other personal identification numbers, confidential personal or financial information, protected health information, student educational records, proprietary customer data or information that is otherwise deemed to be protected by HSL corporate policy, state, federal, or international laws, statutes, or regulations or explicitly identified in a contract.

4   Policy Statement

The following institutional policies and procedures apply to those projects, principal investigators and their respective team members working with CMS data.

5   Procedures

Unless explicitly excluded or overridden by contract or data use agreement, the following policies apply to all CMS projects.

5.1   Applicable Policies

Level	Category	Policy Name	Notes
HSL	IT	Use of Information Technology	
		Computer Use, Email and Communications	
		HIPAA	
IFAR	IRB	Standard Operating Procedures	
		Limited Data Sets and Data Use Agreements	
		Staff Change and Data Access	
	Data Management	Sensitive Data Security	
		Sensitive Data Sharing	
		Sensitive Data Suppression	
		Sensitive Data Retention and Destruction	
	IT	Data Encryption	

6   Related Policies

The document author(s) have attempted to identify policies that may be applicable or related to this policy. This is not an exhaustive list. All HSL employees are expected to abide by all active policies of the organization at all times. As such, employees are encouraged to review any and all potentially applicable policies regardless of whether they are identified below. HSL reserves the right to modify, cancel, or enact new policies at anytime, without notice.

- NA (no known related policies)

7   Reference Materials

NA

8   Appendix

NA

9   Document Properties

Title:	CMS Policy
Author:	Jason Rightmyer
Version:	V1.1
File Name:	CMS Policy.docx