

Sensitive Data Suppression Policy

Institutional Policy

Title:	Sensitive Data Suppression Policy
Responsible Officer:	Director, Research Informatics
Original Effective Date:	3/5/2014
Revised Date:	2/8/2019
Renewal Date:	On or before 2024
Approved By:	<i>Kathryn Tasker</i>

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1 Purpose

This policy is intended to protect the privacy of participants in health research studies and/or patients whose data is considered sensitive or whose data was provided through a formal Data Use Agreement (DUA) or Data Sharing Agreement (DSA) such as the Centers for Medicare and Medicaid Services (CMS).

2 Scope

This policy applies to all employees including research faculty and staff as well as contracted employees of HSL working with sensitive data or otherwise stipulated in a signed Data Use or Data Sharing Agreement (e.g. CMS).

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

It is the policy of the institution to suppress the reporting or tabulating of statistics resulting from fewer than 11 persons, if the data are considered sensitive or otherwise stipulated in a Data Use or Data Sharing Agreement.

5 Procedures

In the context of this policy, reporting or tabulating refers to any preparation of data that might be viewed by persons not listed on a DUA or DSA.

5.1 General Rules

1. Data analysts will document that every reported statistic or tabulated value reflects a group or sub-group that includes more than 10 individual people.
2. Unless the data are completely de-identified and public use data files (i.e., if they are identifiable or limited data sets) then cell suppression must be observed.
3. This policy does not mean to imply that all analyses and results must be based on subgroups of size 11 or larger. Instead, the policy provides that any table or figure prepared for consumption by persons not listed on the DUA/DSA must be based on at least 11 persons.

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 any time, without notice.

- NA (no known related policies)

7 Reference Materials

NA

8 Appendix

NA

9 Document Properties

Title:	Sensitive Data Suppression Policy
Author:	Jason Rightmyer
Version:	V1.1
File Name:	Sensitive Data Suppression Policy.docx