

Data-Linkage Policy – Proposed Changes

Current language in the Data Linkage Policy	Proposed new language in the Data Linkage Policy
<p>For the purposes of this Policy, the Green Mountain Care Board defines data linkage as the merging of two or more unique data sets or files to connect common identifiers across the sets. Data linkages are carried out to improve the robustness of research data and to create more complete data sets. Linkage may be necessary in health services research to answer a specific research question. While the Authorized User (linkage requestor) would facilitate the data linkage, stewardship of the underlying data sets remains with the steward(s). This Policy does not address, nor will the GMCB contemplate, linking of data sets for the express purpose of creating a new, novel, or “master” database that would then be under the sole authority of the entity establishing the linked data set.</p>	<p><u>GMCB Rule 9.501(a) states that no person outside the Board may link VHCURES or VUHDDS data, including public use data, with any data sources containing personally identifiable information or other data sources that could result in the identification of individuals in the data set without the express written consent of the GMCB.</u> For the purposes of this Policy, the Green Mountain Care Board <u>GMCB Rule 9.501(a)</u> defines data linkage as the merging of two or more unique data sets or files to connect common identifiers across the sets. Data linkages are carried out to improve the robustness of research data and to create more complete data sets. Linkage may be necessary in health services research to answer a specific research question. While the Authorized User (linkage requestor) would facilitate the data linkage, stewardship of the underlying data sets remains with the steward(s).</p> <p><u>This Policy describes circumstances under which the GMCB may allow the linkage of VHCURES or VUHDDS data with data sources containing personally identifiable information or other data sources that could result in the identification of individuals in the data set. This Policy does not address, nor will the GMCB contemplate, linking of data sets for the express purpose of creating a new, novel, or “master” database that would then be under the sole authority of the entity establishing the linked data set.</u></p>
<p>Any amendments to an approved data linkage, including linkages to additional data sets, need to be reviewed and approved prior to any amended activity.</p>	<p>Any amendments to an approved data linkage, including linkages to additional data sets, need to be reviewed and approved prior to any amended activity, <u>except that amendments to an approved data linkage project that only include additional years of data or extend the timeline of the data linkage do not need to be reviewed and approved prior to any amended activity, provided that the GMCB is notified in advance of the changes;</u></p>