

VHCURES Data Linkage Request



144 State Street  
Montpelier, VT 05620  
802-828- 2177  
[gmcboard.vermont.gov](http://gmcboard.vermont.gov)

INSTRUCTIONS.....	3
Introduction.....	3
Data Linkage Request Process .....	3
General Instructions.....	4
Definitions .....	4
Data Linkage Request Checklist.....	5
DATA LINKAGE REQUEST FORM.....	6
Data Linkage Project Description .....	6
Linkage Data Management Plan .....	9
Data Linkage Project Team.....	12
Signatures .....	15
GMCB Processing Section.....	15

## INSTRUCTIONS

### Introduction

The Vermont legislature authorized the collection of eligibility and claims data for Vermont residents to enable the Green Mountain Care Board (GMCB) to carry out its statutory duties that include determining the capacity and distribution of existing resources; identifying health care needs and informing health care policy; evaluating the effectiveness of intervention programs on improving patient outcomes; comparing costs between various treatment settings and approaches; providing information to consumers and purchasers of health care; and improving the quality and affordability of patient health care and health care coverage. (18 V.S.A. § 9410) The GMCB can make the VHCURES data set available to the extent permitted by the Health Information Portability and Accountability Act (HIPAA) and other pertinent state and federal laws and regulations.

The claims and eligibility data available under a data use agreement can be broadly grouped into three lines of business including commercial, Medicaid, and Medicare. The GMCB has independent discretion to make decisions regarding the use and disclosure of commercial insurer data. The Department of Vermont Health Access (DVHA) and the GMCB share discretion with respect to the Medicaid data subset. DVHA must approve the use and disclosure of Medicaid data and must sign the Data Use Agreement (DUA) for authorized users of the Medicaid data subset. Per an agreement with the federal Centers for Medicare and Medicaid Services (CMS), the Medicare data subset is available only to Vermont State Agencies and entities performing research that is directed and partially funded by the State of Vermont. CMS has granted GMCB independent discretion to make decisions regarding the use and disclosure of the Medicare data subset by Vermont state agencies.

The GMCB must approve all requests from state agencies and other organizations to link the VHCURES data with other identifiable data sources or any other data sources that could be used to reidentify individuals in the VHCURES data set.

### Data Governance Council

The GMCB chartered the [Data Governance Council](#) (DGC) to oversee the stewardship of VHCURES including the development and revision of principles and policies to guide decisions on data use and disclosure. The DGC supports the GMCB decision-making process for applications requesting use, disclosure, and redisclosures of VHCURES data.

### Data Linkage Request Process

This Data Linkage Request Form (DLRF) must be filed by agencies and organizations with DUAs wanting to link the VHCURES data with any identifiable record-level data sources (records with personally identifying information (PII)) or other data sources that could result in the identification of individuals in the VHCURES data set. DVHA will review requests for linkages that include Medicaid data. The GMCB must approve all requests for these linkages before the linkages are performed by data users. Unauthorized linking of VHCURES data with other data sources without prior approval of the GMCB could result in forfeiture of the DUA. Entities responsible for disclosures of VHCURES data with PII will be subject to civil and criminal sanctions under applicable state and federal laws and regulations.

Requestors (Vermont state agencies or non-state entities with VHCURES DUAs) must provide a list of data sources to which the VHCURES data would be linked and identify which data sources include personally identifiable information including the specific identifiers within those data sources.

The Principal Investigator (PI) identified on the DUA must ensure that Individual User Affidavits (IUAs) are filed with GMCB for all data users involved in the data linkage project who have not already filed IUAs under the DUA. When signing the IUA, each data user attests to understanding the appropriate use and disclosure of the data set and agrees to comply with the requirements.

If after reviewing the DLRF GMCB disapproves any data linkages, the GMCB will provide a written explanation to the requesting organization holding the DUA identifying the reasons for denying any data linkages.

## General Instructions

Requestors must complete all required sections of the DLRF and submit an electronic copy of the completed request form, including all attachments, to [gmc.data@vermont.gov](mailto:gmc.data@vermont.gov)

Incomplete forms will not be reviewed until the requestor has provided all required information. A checklist is provided to help ensure that your form is complete. For questions about the data linkage request process, contact [gmc.data@vermont.gov](mailto:gmc.data@vermont.gov)

## Definitions

**Agent:** Means any individual or entity (e.g., a contractor, subcontractor, grantee, or subgrantee) acting on behalf of the Authorized User and subject to the Authorized User's control or accessing the Data Set on behalf of the Authorized User.

**Authorized User:** The Authorized User (AU) is an organization or agency that is applying or has obtained a data use agreement (DUA). The AU signatory on the DUA has the authority to sign legally binding agreements on behalf of the organization or institution.

**Data Custodian:** The data custodian is responsible for the establishment and maintenance of physical and technical safeguards to prevent unauthorized access to and use of the data set. Agencies and organizations may designate multiple data custodians for different departments and programs. The data custodian(s) typically coordinate the receipt of the approved data set from GMCB's data consolidation vendor. The principal investigator may also be the data custodian. External agents approved by the GMCB through this Data Rediscovery Request Form to receive the data set or custom extracts must identify and file contact information for their data custodian(s) with the GMCB.

**Institutional Review Board (IRB):** An institutional review board (IRB), also known as an independent ethics committee (IEC), ethical review board (ERB), or research ethics board (REB), is a committee that has been formally designated to approve, monitor, and review biomedical and behavioral research involving humans.

**Personally Identifiable Information (PII):** The term PII refers to information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case

assessment of the specific risk that an individual can be identified. It is important to recognize that non-PII can become PII whenever additional information is made publicly available when combined with other available information.

Source: <https://www.gsa.gov/reference/gsa-privacy-program/rules-and-policies-protecting-pii-privacy-act>

**Principal Investigator (PI):** The Principal Investigator (PI) means the individual designated by the Authorized User to be responsible for ensuring compliance with all the restrictions, limitations, and conditions of use and disclosure specified in the VHCURES DUA. The PI may delegate technical responsibility to other personnel for the establishment and maintenance of security arrangements to prevent unauthorized access to and use of the data.

**Requestor:** The requestor is the Vermont state agency, organization, or entity requesting authorization from the GMCB to re-disclose the VHCURES data available under the data use agreement (DUA) to an external agent to perform work directed and funded by the Requestor. External agents may include contractors, subcontractors, grantees, sub-grantees, and other types of entities as identified by the GMCB.

**Research:** A systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge.

**State Entity:** Vermont agencies, contractors, or other organizations performing work directed and partially financed by the State of Vermont.

## Data Linkage Request Checklist

*(For use by the Requestor. Requestors must include all required attachments and applicable optional attachments)*

### Completed Form

Data Linkage Project Description Including External Data Sources

Linkage Data Management Plan

Data Linkage Project Team

Signatures

### Required Attachments

**Attachment 1:** If this linkage project requires a redisclosure of VHCURES data to an external agent (contractor, subcontractor, grantee, sub-grantee), you must file a VHCURES Data Redisclosure Request Form unless one has already been filed and approved by the GMCB.

**Attachment 2:** If applicable to this data linkage request, attach Institutional Review Board approval document pertaining to the project for which the VHCURES data would be linked with other identifiable data sources.

**Attachment 3:** Other materials that may be requested by the GMCB for reviewing this form.

## DATA LINKAGE REQUEST FORM

### Data Linkage Project Description

Describe the project for linking VHCURES DUA with data sources with personally identifiable information or with other data sources that could result in identifying individuals in the VHCURES data set. Answer

every question in this section. If a question does not apply to the project, indicate that the item is “Not Applicable.” Do not leave a question blank or the form will be deemed incomplete.

### Overview of VHCURES Linkage Project

<b>DATA USE AGREEMENT INFORMATION FOR REQUESTOR</b>
DUA Identifier (Assigned by the GMCB to the DUA): UVM_DUA_2018
DUA Agency or Organization Name: University of Vermont
DUA Project Name (As stated in the DUA application or DUA): Evidence based Interventions to address Structure, System and Population Inequities in COVID-19 Screening
DUA Authorized User Signatory Name & Title: T. Plante, Assistant Professor
DUA Principal Investigator Name & Title (if different from Authorized User): Jan Carney, Professor
Data Linkage Project Lead’s Name and Title (Contact managing the data linkage project for the organization with the DUA): Jan Carney, Professor
<p>Brief Description of the Data Linkage Project (Summary of subsections 1-2-1 and 1-2-2): We will link Covid-19 testing data from the Vermont Department of Health with individuals in the VHCURES. We propose to link (through OnPoint) using names and ages. Additionally, we hope to link vital statistics data from the Vermont Department of Health, in the same manner as COVID-19 data (via OnPoint).</p> <p>This project will enable us to identify optimal testing locations and strategies for future pandemics to prevent morbidity and mortality. We will measure the effect of location, distance and local infection rates on the probability of being tested. Using the VHCURES, we can also identify whether the testing strategy was effective in helping high risk populations receive tests in a timely way. The project is funded by NIH and has IRB approval from UVM and the AHS.</p>
Linkage Project Start Date: November 1, 2022
Linkage Project End Date (Indicate if the project will be ongoing for the term of the DUA): December 31, 2023
<p>Does the linkage project require redisclosure of VHCURES data to an external agent?</p> <p>No- Skip the External Agent Information Section below.</p> <p>Yes- Complete the External Agent Information section below. <b>You must file a VHCURES Data Redisclosure Request Form</b> or already have had the data redisclosure approved by the GMCB.</p>
<b>EXTERNAL AGENT INFORMATION</b>
External Agent’s Project Lead- Name and Title (External agent to whom VHCURES data would be redisclosed for the to support the data linkage project):
External Agent’s Organization or Company Name:

## Description of Data Linkage Project

Answer the following questions about the project that requires linkage of VHCURES data with other data sources.

- Summarize the purpose and objectives of the proposed research requiring linkage of VHCURES data with other data sources.

We propose to link VHCURES data with data from the state Department of Health on Covid-19 testing, and data on mortality from vital statistics. We are working collaboratively with the Department of Health using a project funded by NIH to evaluate Covid-19 testing locations and to identify opportunities to improve testing rates in future pandemics by identifying barriers to testing in rural areas.

- List and describe identifiable record-level data source(s) (records with personally identifiable information (PII)) you are planning to link with VHCURES data. List all personally identifiable information in the external data sources that would be linked with the VHCURES data. may Explain the matching methodology for linking the data. If the VHCURES records could become identifiable during the linkage process, explain how the identity of individuals and their PHI will be protected from potential opportunities for disclosure.

We wish to link data on individual Covid-19 testing to the VHCURES. The testing data includes names, addresses plus information on testing location, date, type of test, result of test and other testing related variables. Additionally, we wish to link vital statistics data to VHCURES members, including date of death and ICD cause of death. We propose to link the testing and mortality data to VHCURES using names and addresses. We would like the linkage to be performed by OnPoint, and we would like to receive deidentified data with the exception of: dates of service (from VHCURES and VDH), address of patient and test (from VDH). Address data are needed for geospatial analysis of testing coverage and access. All data will be stored securely on UVM's "prohibited systems" computer network (SEDRC), and will be tightly access-controlled to prevent disclosure. No data will leave the system at any time, including during geocoding, which will be done locally.

- Explain whether the proposed linkage project was review and approved by an Institutional Review Board (IRB). If yes, attach the IRB approval document as Attachment 2 to this form.

We received IRB approval from UVM and the AHS.

## VHCURES Data for Linkage with Other Data Sources

Indicate the VHCURES data files that would be linked for this project.

File Type	Commercial Insurers	Medicaid <sup>1</sup>		Medicare <sup>2</sup>	Data Subset Specifications: Date Range and Gender, Age, Other Cohorts as applicable. <sup>3</sup>
Medical Eligibility-VT Residents					
Medical Claims-VT Residents					
Medical Eligibility- 5% National Sample	Not applicable	Not applicable			
Medical Claims- 5% National Sample	Not applicable	Not applicable			
Pharmacy Eligibility		Not applicable			
Pharmacy Claims		Not applicable			
<a href="#">Medicare Part D Event</a> - VT Residents	Not applicable	Not applicable			
<a href="#">Medicare Part D Event</a> - 5% National Sample	Not applicable	Not applicable			
Medicare <a href="#">MEDPAR</a>	Not applicable	Not applicable			

<sup>1</sup> The Department of Vermont Health Access (DVHA) must approve uses and disclosure of Medicaid data..

<sup>2</sup> Medicare data may only be used for research directed and partially funded by the state of Vermont.

<sup>3</sup> Refers to Custom Extracts defined under Definitions in this form supporting the data stewardship principle of using the “minimum necessary” data to support the stated research purpose of the project.

## Linkage Data Management Plan

Section 2 relates to the policies and procedures to ensure the proper management of VHCURES data that may include personally identifiable information after being linked with other data sources. The GMCB recognizes the applicability of best practices for information security and privacy used in the CMS Data Privacy Safeguard Program (DPSP). Respond to every question about the technical and administrative safeguards over the data.

### Physical Possession and Storage of Data Files

- Describe how the Principal Investigator and project leads will maintain an accurate and timely inventory of the users and locations of VHCURES data and any derived files that may contain personally identifiable information.

All data will be stored exclusively on the University of Vermont secure servers as in previous projects. All users will have an active IUA, and will be trained on UVM's data security policies and best practices.

- Describe any training that linkage project staff have had on protection of sensitive data with personally identifiable information protected health information, and other sensitive financial, economic, and personal information.

All study team members have completed CITI training prior to being granted access to the data.

- Describe the protocol that would be followed by the linkage project staff to report and mitigate a breach in the security of data with personally identifiable information.

UVM has a well established protocol in place. Full details are available at

<https://www.uvm.edu/sites/default/files/UVM-Policies/policies/databreach.pdf>

- What actions will be taken to physically secure the data files that may contain PII during or following the linkage? This includes files on servers, local workstations, and hard media.

No data will be stored on local workstations, etc. All data will remain in the UVM HIPAA compliant servers. These data are access-controlled, and encrypted at-rest as well as during transit to the server from OnPoint.

- Please explain if there is any plan to transmit, store, or transfer the data set or any derived files following the linkage between files outside the continental United States.

No data will be transmitted outside the continental United States.



## Data Sharing, Electronic Transmission, Distribution

- Describe what the policies and procedures will be for sharing, transmitting, and distributing the VHCURES data set and any derived files that may include PII with members of the linkage project team.

Data containing PII will not be transferred anywhere outside of the secured server environment described earlier. Members of the linkage project team with access to raw data will access it over a secure VPN. Any file transfers which occur between OnPoint and UVM will use the Kiteworks system, which relies on SFTP for transmission.

- The GMCB's preferred method of transmission of the data files is through a secure File Transfer Protocol (SFTP) transmission. If you anticipate requesting or transferring files for this linkage project via encrypted hard media, please explain the reasons that SFTP is not an option.

We will use SFTP protocols.

- Describe methods for tracking, monitoring, and auditing access and use of the VHCURES data set or derived extracts of the data set in use for this data linkage project.

Data will be secured on a restricted server with access limited to study personnel only.

- Describe the policies and procedures and procedures that will be used to define data access privileges for individual users of the data, including the project leads, data custodians, analysts and researchers, and IT support.

Only members of the study team identified in the DUA will be allowed access.

- Explain your technical safeguards for data access (which may include password protocols, log-on/log-off protocols, session time out protocols, and encryption for data in motion and data at rest).

Data will only be available via remote access into the secure server.

- If additional copies of the VHCURES data used in this linkage project will be housed in separate locations, please describe how the data will be transferred to these locations.

No additional copies of the data will be stored.

## Completion of Research Tasks and Data Destruction

- Describe how the PI for the DUA will complete the Certificate of Data Destruction for the data and derived files used in this linkage project will be deleted, destroyed or rendered unreadable upon completion of the project.

The PI for the DUA will complete the Certificate of Data Destruction upon completion of the project.

- Describe the policies and procedures that will be used to protect the data and derived files from this linkage project when individual members of the project team terminate their participation in this project.

When individuals leave the study team, access to the remote server will be terminated.

### Data Linkage Project Team

#### Data Linkage Project Lead (From agency or organization with the GMCB VHCURES DUA)

Please provide contact information for the project lead for data linkage as identified in the table under 1-1 in this form.

Name and Title of the Data Linkage Project Lead		
Jan Carney, Professor		
Project Lead's Agency or Organization Name		
Website		
University of Vermont		
Street Address		
1 S. Prospect		
City	State	Zip
Burlington	VT	05419
Telephone		Email
802-847-8268		Jan.Carney@med.uvm.edu

### Data Custodian(s) for Data Linkage Project

Please provide contact information for the data custodian(s) who will be storing and managing the VHCURES data set or derived files during and following the data linkage.

Name and Title of Data Custodian		
T. Plante, Assistant Professor		
Organization		
Website		
University of Vermont		
Street Address		
1 S Prospect St		
City	State	Zip
Burlington	VT	05419
Telephone		Email
		Timothy.plante@med.uvm.edu

Name and Title of Data Custodian		
Organization		
Website		
Street Address		
City	State	Zip
Telephone		Email

Name and Title of Data Custodian		
Organization		
Website		
Street Address		
City	State	Zip
Telephone	Email	



## Signatures

*All statements made in this application are true, complete, and correct to the best of my knowledge.*

<b>DUA Principal Investigator (Requestor)/Name:</b> Jan K. Carney, MD, MPH	
Signature: <b>Jan K Carney</b>	Date: 10/31/2022

<b>Data Linkage Project Lead Name</b> (if different from Principal Investigator):	
Signature:	Date:

## GMCB Processing Section