UCLA Health

Third Party Health Data Agreements – Data Release Request

This document serves as the data release request for review by the Data Release Subcommittee of the Data Strategy and Governance Committee. Prior to submission, please review the *Third Party Health Data Agreements – Mandated Contract Terms* document for details regarding the terms a third party must agree to prior to contract approval. A third party is defined as any for profit or not-for-profit entity.

Title of Request			
Contact Name		Contact Email	
Requester Name		Requester Email	
Requester Department			
Proposed Data Recipient Organization			
Description of Data to be Released	[Describe amount of data (number of unique individuals), types of data, and the sources of data, including whether the data is derived from the treatment or care of patients at UCLA Health.]		
Does the data contain high-risk health data?	◯ Yes ◯ No [High-risk health data includes including HIV, hepatitis, psychiatric illness, substance abuse treatment, laboratory testing for drugs of abuse, sexual orientation and gender identity, and genetic tests]		
Will data include data from other UC campuses?	◯ Yes ◯ No [If yes, please list the names of the other UC campuses.]		
Source(s) of Data	◯ Data was collected or generated for patient care ◯ Data was collected or created for research ◯ Other (describe):		
For data generated during a sponsored research trial that appears in the subjects' medical record (i.e. health data), did subjects sign a consent that allows this data to be shared outside the study team?	◯ Yes ◯ No ◯ Not applicable [If yes, please attach a copy of the approved consent form. If no, please explain how subject consent will be obtained or why it is not required. If either yes or no, please attach the IRB approval number and grant, contract, or support information related to this data release request.]		
Proposed Uses of Data by the Recipient	[Describe what the data recipient proposes to do with the data.]		
Potential Conflict of Interest (COI)	Do you hold a management position such as board member, director, officer, partner, or trustee in the entity?		
	Do you have an investment or ownership interest in the entity?		

	Did you receive income from the entity within the last 12 months? Income includes any payment, such as salary or consulting fees, royalty payments (paid directly by the entity), reimbursement of expenses (including travel).	
	Are you the inventor or co-inventor of intellectual property (e.g. technology, tangible research materials, copyrighted software, etc.) related to the data that you wish to share/release? [If yes, please provide the UCLA case number.]	
	Is there a letter of intent, option, or license to the entity for intellectual property related in any way to the data that you want to share/release?	
	Is the entity supporting current research that you are conducting at UCLA or supported prior research at UCLA through either a contract, grant, or gift? [If yes, please identify.]	
Identifiability of subjects	[See definitions of de-identified, limited data set, identified data sets and HIPAA identifiers below.]	
	◯	Identified data
	◯	Limited data set (per HIPAA)
	◯	De-identified data Indicate whether all 18 HIPAA identifiers will be removed or whether a statistical certification of de-identification will be obtained: If any dates will be included, indicate how they will be handled (e.g. date-shifting):
	◯	Aggregate data Will groups having counts less than 10 be removed? ◯ Yes ◯ No
Will the data be used for a research study by the licensee?	◯ Yes ◯ No [If yes, provide IRB number and approval status, or indicate why IRB approval is not required.]	
Have you received Department Chair approval?	◯ Yes ◯ No	

Data Set Definitions:

- *Health Data* is defined as any information pertaining to the health, care, and treatment of UCLA Health patients or health plan members which: (1) results in a report used in treatment or monitoring of a patient; (2) generates a claim or a bill for services that are provided; and/or (3) is used for operations, financial management, population health activities or quality metrics.
    - Prospectively-collected clinical research data and related research results will not be considered Health Data if these data are collected/created exclusively for a sponsored research ("Sponsored Research Data"); however, Sponsored Research Data that appears in the patient's medical record is Health Data. (The use of Sponsored Research Data may be subject to contractual and regulatory obligations; release of Sponsored Research Data

to any entity other than the sponsor of the study must be reviewed in advance by the Clinical Trials Administration Office.)
    - Non-health data is all other data collected at UCLA Health.
- *De-identified*: does not contain any of the 18 HIPAA identifiers; dates must be truncated to the year only, or shifted to hide month and day of actual dates; geographic designations smaller than a state may not be included (other than the first three digits of the zip code if the code contains more than 20,000 people).
    - To see the 18 HIPAA identifiers, scroll to "List of 18 PHI Identifiers" here: http://ora.research.ucla.edu/OHRPP/Pages/HIPAA.aspx
- *Limited data set*: Same as de-identified except that the data set may contains exact dates and geographic designations (including 5-digit zip codes). Note that although a limited data set poses is not *readily* re-identifiable, the dates and geographic designations are still PHI and this data therefore demands the same level of protection from disclosure as other PHI.
- *Identified data*: contains any of the 18 HIPAA identifiers (but if the only HIPAA identifiers are dates and geographic designations, choose "limited data set" instead.]

Approvals:
Vice Chancellor, UCLA Health Sciences
Chief Information Officer, UCLA Health Sciences
Chief Health Sciences Counsel, UCLA Health
Deputy General Counsel - Health Affairs & Technology Law, UCOP
Chief Strategy Officer, UC Health