

## **Attachment 7**

### **CHIS Data Security Policies**

**7A: CHIS Data Security Policies**

**7B: Data Collection Subcontractor Confidentiality  
Protections**

# California Health Interview Survey (CHIS)

## Data Security Policies

The data collection contractor for the California Health Interview Survey will have the primary responsibility to ensure the protection of any identifiable data on respondents. In its contract, the data collection contractor will be required to abide by the UCLA human subject research guidelines. Specific confidentiality protection procedures follow:

- **Secured Electronic Access to Raw Data:** All data will be stored electronically on computers with secured access. Only designated individuals will have access to the raw survey data.
- **Secured Backup of Data:** Backups of data files will be stored in a separate locked facility. Access to these files will be limited to designated individuals and only in case of emergency (e.g. primary data source destroyed by fire).
- **Consent for Contact Information:** After confirming or providing their address information near the end of the survey, the CHIS adult respondents are asked if they would be willing to participate in follow-up surveys. Respondents are provided with three choices: (1) Yes; (2) Maybe; and (3) Definitely No. If respondents answer “yes” or “maybe,” they are considered to have given contact consent to be re-contacted for follow-up studies. If the respondent refuses, then the interviewer will thank the respondent for participating in the survey and terminate the interview.
- **Separation of Contact Data from other Data:** At the completion of data collection, Westat will separate the contact data (name and address, if collected, as well as telephone numbers) and any other data items that may reveal the identity of the respondent (e.g. birthdate). This information will be stored in an ID file, which will be archived with secured access.
- **Data Deliverables without Respondent Identifiers:** The data collection contractor will deliver to the CHIS PI at the UCLA Center for Health Policy Research the analysis data files without the ID file. Only month and year of birth will be included in the analysis files delivered to the Center..
- **Destruction of the ID File:** This information will be stored in two separate ID files: one that contains contact data on respondents who have agreed to be re-contacted for potential follow-back studies (ID\_Recontact\_OK) and another that contains information on all other CHIS respondents. The ID file for potential follow-back study participants (ID\_Recontact\_OK) will be archived by the data collection contractor for five years effective at the completion of the data collection. Unless requested by the CHIS PI at UCLA for an extension, the ID file (ID\_Recontact\_OK) will be destroyed at the end of the five-year period. The ID file for CHIS respondents who have not agreed to be re-contacted for follow-back studies (ID\_No\_Recontact) will be maintained for 90 days after delivery of the final data file and then destroyed.

- **Authorization for Use of the ID File:** Any person wishing to use the ID file for a follow-back study during the archive period will be required to seek review and authorization by both the CHIS Principal Investigator at UCLA and their home institution's Institutional Review Board, which must have a Multi-Party Assurance Agreement with the federal government. Authorized users of the ID file will be required to sign an agreement indicating that the data will be used for research purposes only and that the identity of the respondents will not be revealed to unauthorized individuals or in any reports. Only the CHIS survey data contractor, will be authorized to re-contact subjects on behalf of the California Health Interview Survey.

**Release of Data:** To meet the overall objectives of CHIS, data files (not the ID file) will be distributed to project funders. Files designated for public use will be further edited to prevent analysis that could allow identification of individual respondents. Steps include removing all information that may be used to identify a respondent (e.g. birth month, highly specific ethnicities), topcoding outlier variables such as income or other continuous variables that may lead to disclosure, removal of sensitive data, and adding noise to records that could identify members of small populations. In addition, public use files provided to local health departments will be only be released at the stratum level. All strata have a minimum population of 100,000. Public use files available on the Internet will present statewide data only, and will contain no sub-state geographic identifiers.

CHIS data estimates will be presented through an internet-based system for tailored and descriptive statistics, called *AskCHIS*. Queries can be posed and responses generated automatically in graphical or tabular format and provided to requesters on-line. Algorithms that suppress estimates with small numbers and with sensitive data have been implemented to prevent disclosure of confidential.

Data involving small geographic areas will only be available to authorized researchers through the UCLA Data Access Center, a secure, supervised data analysis facility. Through the implementation of stringent security controls, disclosure review procedures, and staff monitoring, the confidentiality and anonymity of respondents will be ensured. Modeled after the Research Data Center at the National Center for Health Statistics, the Data Access Center has a control workstation and printer in a separate room accessible to staff only. All email, Internet, telephone, USB port, or floppy disk drive capabilities have been disabled, and workstations are supported by a server that has no outside network connections. All output, printouts, and media must be reviewed by the Manager of the Data Access Center before they are released to researchers to remove from the Center.



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Following is a description of the procedures Westat will take to assure confidentiality of survey data collected from California Health Interview Survey respondents:

#### Facility and Personnel Security

- All data processing and telecommunications operations will take place at Westat facilities in Rockville, Maryland.
- Access to Westat facilities and the computer center is restricted through a key-card lock system. Access to the computer room is restricted to only authorized computer room personnel.
- No survey data or respondent identifying information will be transmitted by electronic mail. Security criteria apply to electronic mail transmissions.
- All contract staff working on the study will be required to sign a statement pledging to maintain the confidentiality of all data.
- All personnel are assigned user identification codes and passwords.
- Access to study data will be limited to the staff working on the study.

#### Study Data Security

- Study data will be identified and retrieved by a study number only.
- Social Security Numbers will not be collected.
- There will be no hard-copy records with respondent identifiers or survey responses.
- All computerized data will be maintained in a manner that is consistent with the DHHS ADP Systems Security Policy.
- No reports or data files used for analysis will contain personal identifiers.
- Access to data files is password protected and require user identification codes
- When the study is complete or until the data is no longer required for research, the data will be destroyed as required by NIH Manual 1743 – Keeping and Destroying Records.