

USE AND DISCLOSURE OF ANONYMIZED AGGREGATE DATA POLICY

Category	Stewardship and Access	Policy Owner	Product Director
Policy No.	3.0	Review Frequency	Bi-Annual
Version No.	4.0	Status	Approved
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Approver of Related Procedures	Product Director	Approver(s)	Board

1.0 PURPOSE

1.1 The purpose of this policy is to guide the HDC in facilitating the use and disclosure of fully anonymized aggregate data.

2.0 SCOPE

2.1 This policy applies to all HDC staff and guides HDC’s Clinical Data Stewardship Committee in providing the framework for development of HDC Measures and the use and disclosure of anonymized aggregate data.

2.2 This policy is limited to anonymized aggregate data, which is derived from the summation of clinic-level data to HDC measures. Anonymized aggregate data does not contain personal information and cannot be linked back to any individual clinic, care provider or patient.

2.3 Any use or disclosure of identifiable data processed by HDC as part of its service offerings, such as patient-level data or provider-level and clinic-level aggregations in HDC Discover, is defined by the affiliated data sharing agreement between HDC and the participating clinic and complies with HDC’s [Privacy Policy](#).

3.0 POLICY STATEMENT

3.1 As a not-for-profit organization, HDC is accountable to its members, its physician-led governance, and to all participating clinics and care providers to ensure anonymized aggregate data is used and disclosed as intended: to provide trusted

and meaningful health information, to support knowledge, improved patient outcomes and the sustainability of health care.

4.0 EXCEPTIONS

4.1 There are no exceptions to this policy.

5.0 DEFINITIONS

Clinical relevance	An indication of whether the data is meaningful to a clinical practice, which includes a clinic's operations, a clinician's services, and patient outcomes.
Clinic-Level Data	Data that has been aggregated by the HDC on a clinic's behalf to represent the services of all providers and patient populations in that clinic.
Disclosure	In the context of this policy, disclosure refers to HDC's sharing of anonymized aggregate data with external parties (including users of HDC Discover).
Measures	A property or object on which a calculation, sum, count, average, percent could be made.
HDC Discover User	Registered users of HDC Discover who are seeking aggregated information to support initiatives that benefit patients, providers, and the health care system.

6.0 POLICY DESCRIPTION

6.1 Data Governance

6.1.1 The HDC Board of Directors is responsible for approving all corporate policies and providing oversight to ensure HDC's compliance with these policies.

6.1.2 HDC's Clinical Data Stewardship Committee (CDSC) is a physician-led committee that is accountable to the HDC Board. The CDSC has the responsibility to oversee the development of clinical measures and the use and disclosure of anonymized aggregate data as outlined in this policy.

6.1.3 The CDSC's role includes ensuring HDC's measures are developed with consideration for clinical relevance, fitness in the context to be used, validity, and the privacy of data subjects.

6.2 Authorized Purposes

- 6.2.1 Participating medical clinics authorize HDC to use their clinic-level data to create anonymized aggregate data for the purpose of enabling HDC's [mission and vision](#), including:
- a) Understanding and improving health services delivery and patient outcomes at the practice, clinic, and population levels;
 - b) Supporting individual providers with practice learning, practice enhancement and professional development;
 - c) Supporting clinic and system-level planning (such as planning by Patient Medical Homes (PMHs), Primary Care Networks (PCNs) and Divisions of Family Practice);
 - d) Aiding clinics and health system partners in identifying improvements in quality and efficiency; and
 - e) Inspiring and supporting research.

6.3 Disclosure of Anonymized Aggregate Data via HDC Discover

- 6.3.1 HDC discloses anonymized aggregate data to approved users of HDC Discover for the purposes listed in section 6.2.1.
- 6.3.2 Disclosure to HDC Discover users is facilitated by a framework which enables different levels of access to measures and aggregate data based on
- a) The meaningfulness of the measure in the context that it is being used, and
 - b) HDC's ability to appropriately mitigate disclosure risks, as outlined in Section 6.5.
- 6.3.3 All HDC users must agree and comply with the rules and guidelines that govern access and use of HDC Discover.

6.4 Use and Disclosure of Anonymized Aggregate Data Outside of HDC Discover

- 6.4.1 Any Disclosure of anonymized aggregate data must align with the purposes listed in Section 6.2.1.
- 6.4.2 HDC may use anonymized aggregate data to develop, improve or promote any HDC services that contribute to the purposes listed in 6.2.1. For example, anonymized aggregate data may be used to inform HDC Discover users of new clinical measures or new features in HDC Discover.

6.5 Mitigating Disclosure Risks

- 6.5.1 HDC is committed to taking appropriate safeguards to ensure anonymized aggregate data contributes to quality improvement and learning and is not used for involuntary assessments for accreditation, or regulatory purposes.
- 6.5.2 Reasonable safeguards to prevent anonymized aggregate data from being used in a punitive or coercive manner may include, but are not be limited to:
 - a) HDC’s review and approval of access requests;
 - b) Periodic reviews of access in HDC Discover; and
 - c) Mechanisms to report and manage complaints or violations of HDC Discover’s rules and guidelines.
- 6.5.3 HDC communicates context and limitations that could affect how anonymized aggregate data is used or interpreted where appropriate.
- 6.5.4 HDC undertakes best practices to mitigate the re-identification of anonymized aggregate data. Such practices include but are not limited to withholding small cell-sizes and outliers in data aggregations.

6.6 Transparency

- 6.6.1 HDC will notify HDC Discover users of substantive changes to this policy.

7.0 ASSOCIATED HDC POLICIES AND PROCEDURES

- 7.1 Measurement Approval Procedure
- 7.2 Data Sharing Agreement (DSA)
- 7.3 Registration Agreement
- 7.4 Privacy Policy