Using Administrative Data for Research
Submitted by Research Subcommittee for approval by CRISP Clinical Advisory Board.

Background
As CRISP becomes a mission-critical asset in supporting clinical care, more researchers are interested in leveraging process-level data in assessing the impact of the availability of various CRISP resources on healthcare workflow and other more administrative considerations. CRISP has received requests to make administrative data – such as audit logs and access patterns – to assess the value of training programs, workflow changes, etc. In cases where no patient data – whether at a patient level or in the aggregate -- are being requested by researchers, the risks of sharing such data are significantly lower. In such instances, it is not necessary to employ many of the safeguards we use for protecting personal health information (PHI). There is no other use case for research that currently supports the use of administrative data.

Use Case Description
Researchers should request data under the Administrative Data use case when they only require audit data or other administrative data sets that are not derived from clinical data. Examples of administrative data include:

- Audit logs for the Unified Landing Page comparing frequency of access via embedded apps versus single sign-on versus individual credential sign-on.
- User experience logs showing what pages were accessed.

Researcher responsibilities
To participate in this service, researchers are required to do the following:

- Submit a data use request to CRISP with the appropriate accompanying documentation for an IRB-approved study using the data sets intended for submission. An IRB waiver determination may also be suitable in this type of study.
- Because these studies do not require the use of sensitive data, no additional security measures are required and the data stewardship portions of the application can be limited to acknowledging that no patient information will be used.
- Provide acknowledgement of the use of CRISP data in publications resulting from its use.
- Reimburse CRISP’s chargeable costs and expenses.

CRISP responsibilities
CRISP is responsible for the following:

- Review and approve data access requests in accordance with CRISP’s governance process. If data request involves no PHI or other patient-specific data, approval can be handled internally without explicit review by the CRISP Research Subcommittee.
- Provide boilerplate language that accurately describes the data provided for the study for use in publication.

Permitted Purpose Category
Permitted purpose #4, Research.

Approval:
This Use Case Policy has been approved by the Clinical Advisory Board.

Chairperson

Date Approved

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