

FREQUENTLY ASKED QUESTIONS (FAQS)

1) Why is a DSA required?

DHA requires an approved DSA when requestors ask to use DHA data. The DHA, as a covered entity, uses the DSA process to:

- Confirm that data will be used as allowed under the regulations
- Promote privacy responsibility in the MHS
- Maintain documentation in case of an investigation or audit
- Share only the minimum data necessary for the purpose

2) Who needs a DSA?

- Business Associates who need DHA data to do work on behalf of the government
- Government personnel who need DHA data for a research project or a survey
- Researchers who need DHA data for a research project or survey
- Students and professionals who need DHA data for an academic research project or for a dissertation

3) How is the DSA request process initiated?

Requestors submit a Data Sharing Agreement Application (DSAA) endorsed by both the Applicant and Sponsor.

4) How long will it take to obtain an approved DSA?

A DSA may be approved within 10 business days after a DSAA is approved.

5) Who should be listed on the DSA?

The Applicant, Government Sponsor, and DHA Privacy and Civil Liberties Office (DHA Privacy Office) are listed on the DSA.

6) Does the DSA Sponsor need to be a member of the MHS?

Yes, the DSA Sponsor needs to be a member of the MHS.

7) How early should a DSA Renewal Request be submitted?

The DSA Renewal Request should not be submitted until the contract option year (as listed on the Renewal Request) has been granted.

FAQS (continued)

8) What is (PII)?

Under DoD 5400.11-R, "Department of Defense Privacy Program," May 14,2007, personally identifiable information (PII) is information about an individual that identifies, links, relates, or is unique to, or describes the individual. Examples are: a social security number; age; military rank; civilian grade; marital status; race; salary; home or office phone numbers; and other demographic, biometric, personnel, medical, and financial information.

9) What is PHI?

Under DoD 6025.18-R, "Department of Defense Health Information Privacy Regulation, protected health information (PHI) is a subset of PII. PHI is health information, including demographic information collected from an individual, created or received by a health care provider, health plan, employer, or health care clearinghouse, and relating to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual; and that identifies the individual; or with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

10) What is de-identified information?

HIPAA defines de-identified data as:

- Data that does not identify an individual
- Data that has the 18 categories of direct identifiers removed
- Data that allows no reason to believe it can be used, alone or in combination with other information to identify an individual

11) What is a limited data set?

DoD 6025.18-R defines a limited data set as PHI that excludes 16 of the 18 direct identifiers. A limited data set may still include the following (potentially identifying) information: admission dates, discharge dates, service dates, dates of birth, and, if applicable, age at time of death (including decedents age 90 or over). Also, five-digit zip code or any other geographic subdivision, such as state, county, city, precinct, and their equivalent geocodes (except street address) may also remain as part of a limited data set (LDS).

