CONTROLLED SUBSTANCES REPORTING SYSTEM

Process for requesting data

NC Law The Controlled Substances Reporting System Act 90-113.74 Confidentiality (10) (d) states, "The Department may provide data to public or private entities for statistical, research, or educational purposes only after removing information that could be used to identify individual patients who received prescription medications from dispensers."

All research decisions are made by a central research committee and you are welcome to submit your proposal and associated IRB to the committee using the Access to Health Information for Research Form available on the DHHS website.

PMP Aware cannot be used for research purposes.

Protocol for release of de-identified data

1. Researcher must apply for the release of the de-identified data by providing the completed "Data Use Agreement", "Access to Health Information for Research Form", and IRB approval if one is required for the study.
    a. To Frances Bethea, Privacy Official (DMH/DSOHF)
    Frances.bethea@dhhs.nc.gov

The Privacy Official provides all submitted documents to the committee which meets at the beginning of each month for review. Please direct any additional questions to Frances Bethea so they can be discussed by the committee.

Frequently Asked Questions

1. **Publicly Available Information**
    a. https://data.cdc.gov/browse
    b. https://injuryfreenc.shinyapps.io/OpioidActionPlan/

2. **Research Request to Controlled Substances Reporting System Instructions**
    a. Researcher must apply for the release of the de-identified data by providing the completed "Data Use Agreement", "Access to Health Information for Research Form" and IRB approval if one is required for the study.
        i. To Frances Bethea, Privacy Official (DMH/DSOHF)
        Frances.Bethea@dhhs.nc.gov

3. **Law outlining Confidentiality of CSRS data for research**
    a. NC Law The Controlled Substances Reporting System Act 90-113.74 Confidentiality (10) (d) states, "The Department may provide data to public or private entities for statistical, research, or educational purposes only after removing information that could be used to identify individual patients who received prescription medications from dispensers."

4. **When will my request be reviewed?**
    a. The Privacy Official provides all submitted documents to the committee which meets at the beginning of each month for review.

5. **What is the definition of De-Identified Data?**

De-identified health information **may not include** any of the following direct identifiers of the DMH/DD/SAS AND DSOHF client/patient or of the client/patient relatives, employers, or household members

- Names
- Geographic subdivisions smaller than a state
- ZIP codes (except first three digits if the combined population of all ZIP codes beginning with those three digits is greater than 20,000)
- All elements of dates except year (i.e., month/day; however, year must be excluded for clients/patients age 90 and older) directly related to a DMH/DD/SAS AND DSOHF client, including birth or death or dates of health care services or health care claims
- Telephone numbers
- Fax numbers
- Electronic mail addresses
- Social Security Numbers
- Medical record numbers
- Health plan beneficiary identifiers
- Account numbers
- Certificate/license numbers
- Vehicle identifiers and serial numbers, including license plate numbers
- Medical device identifiers and serial numbers
- Web universal resource locators (URL)
- Internet protocol (IP) address numbers
- Biometric identifiers, including finger and voice prints
- Full face photographic images
- Any other number, characteristic, or code that could be used by the researcher to identify the client

Note: Although de-identified health information cannot contain a birth date, it may contain the client/patient age expressed in years, months, days, or hours, as appropriate, except for clients/patients who are aged 90 years or more. For persons aged 90 years and above, the age in de-identified health information can only be stated as being within the category of age 90 or above.

6. **Can we access the Controlled Substances Reporting System to gather data?**

a. No. All data requests must be:
    i. De-identified
    ii. Approved by the CSRS team
    iii. Delivered by the CSRS team
b. The Controlled Substances Reporting System Act 90-113.75. Civil Penalties (a) states, "A person who intentionally, knowingly, or negligently releases, obtains, or attempts to obtain information from the system in violation of a provision of this Article or a rule adopted pursuant to this Article shall be assessed a civil penalty by the Department not to exceed ten thousand dollars ($10,000) per violation and shall be temporarily barred from accessing the system until further findings by the Department."

7. **Available Fields**
    a. See Data Guide

8. **Can we publish our research?**
    a. Only after the CSRS team reviews and approves the publication.

9. **When can we expect to see the data request results?**
    a. Please specify your requested timeframe on the Access to Data Form and if your data request is approved by the committee the team is happy to work with you in efforts to meet your deadline.

10. **Additional Questions?**

Please contact Frances Bethea, Privacy Official (DMH/DSOHF) Frances.Bethea@dhhs.nc.gov with your completed documents and questions so they can be reviewed by the committee.