





# Integrating Information: Research



Advocate Health became an Affiliated Covered Entity (ACE) under HIPAA. All care delivery entities under Advocate Health (Advocate Health Care, Aurora Health Care, Atrium Health) as well as Wake Forest University School of Medicine, are now integrated from a privacy standpoint and can share protected health information (PHI) as if they were one entity. While privacy responsibilities, controls and safeguards still apply, there is more flexibility on accessing and using PHI across the enterprise. Below are some impacts of this key step in integration. Contact Enterprise Privacy or Research with any questions.

## What ACE Status Means for Research

	<p><b>Can now share PHI for activities preparatory to research:</b> Under HIPAA, researchers can review (but not use or remove) PHI for activities that are preparatory to research. Now that we are fully integrated under HIPAA, researchers can access PHI belonging to the other covered entity in the ACE by following institutional requirements. Advocate Health Care, Aurora Health Care and Atrium Health require that specific IRB review procedures are followed to access PHI for “preparatory to research” activities. No access of PHI for research purposes is allowed without IRB clearance.</p>
	<p><b>Can now engage in cross-campus research:</b> By becoming an ACE, the enterprise is considered one organization for HIPAA purposes. This means that cross-campus research can be conducted with appropriate IRB approval. For example, Advocate Health Care and Aurora Health Care can now give Atrium Health access to EMR data for research purposes and vice versa if IRB approval is in place.</p>
	<p><b>Can add researchers to pre-ACE Studies:</b> If an investigator from one region wants a researcher from another region to join their study, the IRB must be consulted about the appropriate processes.</p>
	<p><b>Restrictions still apply for other data:</b> This change applies to HIPAA-protected data only (PHI). All other data (such as employer, claims or costs data, or other restricted information) should be requested through the normal processes for review. Only Research executives, Legal and Privacy can authorize you to share non-PHI confidential information. Refer all questions to these partners and do not proceed until they give you permission to do so.</p>

While achieving ACE status is a significant step in our integration journey, there are many aspects of integration that are still in process, including the Research Mission. Contact your research leader or academic executive with any questions about the overall integration of the Research Mission.