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To:	USARMY APG MEDCOM APHC List Org-BUSOPS-IMD-NMT-CST
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Subject:	"Data Protection Plan Approval,' Project Modification #21-931 COVID-19 Vaccination Perceptions & Messaging Formative Evaluation, Carlson (UNCLASSIFIED)
Date:	Monday, July 12, 2021 9:08:43 AM

CLASSIFICATION: UNCLASSIFIED

Good Morning,

I am reaching out to request your review and approval/feedback on the updated Data Protection Plan for Project Modification *#21-931* COVID-19 Vaccination Perceptions & Messaging Formative Evaluation project plan. Changes from the initial data protection plan are highlighted in yellow.

Thank you so much for your review!

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Data Protection Plan

The Phase 1 data protection plan was submitted for review by APHC Information Management Division personnel in February 2021 and approved on 24 February 2021.

The PHAD evaluation team (as defined in this document) will collect data from Public Health Emergency Officers (PHEOs)/Assistant Public Health Emergency Officers (APHEOs) and Command Surgeons identified using a convenience sampling approach. The evaluation team will utilize a semi-structured focus group/interview guide with questions and complementary probes that align with the project's Public Health Guiding Questions outlined above. Two focus groups, one with PHEOs/APHEOs and one with Command Surgeons, and, if necessary based on OCONUS participants' availability for focus group attendance and/or if a participant does not agree to being recorded during a focus group, up to 2 interviews, will be conducted.

At least two members of the PHAD evaluation team will conduct each focus group/interview, with one member designated as the facilitator and the other member(s) as note taker(s). Focus group/interviews will be audio recorded with participant permission. Because voices can be identifiable, care will be taken to ensure data protection protocols are enacted to keep the files secure between data collection and saving audio files and notes on the S: drive. Audio files will be downloaded to a CAC-enabled computer and saved on the secure APHC S: drive in a folder only accessible to the PHAD evaluation team. The evaluation team will also save typed focus group/interview notes on the APHC S: drive in a folder only accessible to the team.

The notes will be analyzed by members of the PHAD evaluation team using a rapid action approach to provide initial aggregate findings and recommendations to PHCOM. As part of the data cleaning process, the evaluation team will listen to the audio files and revise the notes captured during data collection events to ensure accuracy and completeness. The notes will then be coded and analyzed by members of the PHAD evaluation team followed by direct content analysis and theming using NVivo 12. Any potentially identifiable information provided by participants during their focus group/interview will be redacted as part of the notetaking and cleaning process.

1) *From where will the data be obtained?*
   From virtual platform (i.e. MS Teams, DCS) or telephone focus group/interviews with PHEOs/APHEOs and Command Surgeons at selected installations.

2) *If obtaining the data from an external source, how will the data be transferred?*

Not applicable

3) *Are there data use agreements (DUAs) in place?*
Not applicable

4) *Where will the data be stored? How is the data protected in this location?*
Electronic data files are stored on secure, CAC-enabled computers on protected network drives, and all electronic data will be stored on a secure drive that is only accessible to the PHAD evaluation team (i.e., the PHAD S: drive). Upon completion, the PHAD evaluation team will destroy all collected information in accordance with U.S. Government security standards.

5) *Are you collecting PII*? (See definition below)*
We will not be asking participants to identify themselves or provide any demographic information about themselves, other than installation location and command affiliation (i.e., medical, garrison or tactical).

6) *Are you collecting PHI*?*

Not applicable

7) *If using PII and/or PHI, give the data elements you wish to use and explain how they are the minimal amount needed to answer your question(s).*
To minimize PII collection, the evaluation team is not collecting PII or PHI specific to the participant other than installation location and command affiliation (i.e., medical, garrison or tactical). We will only report findings in aggregate by participant type (i.e., PHEOs/APHEOs or Command Surgeons)

8) *Will the data be identified, de-identified, or limited?*
If the data will be de-identified, what is the de-identification process?
How do you assure the data cannot be re-identified – or if it can, explain what you will do with key?

Participants will not be asked to identify themselves by name or provide any demographic information about themselves, other than the installation location and command affiliation (i.e., medical, garrison or tactical). The study will collect information to better understand perceptions regrading COVID-19 vaccination being mandated, and identify anticipated information needs if COVID-19 vaccination is mandated. Any potentially identifiable information that is shared by the participant will be redacted during the data cleaning process and will not be reported in the findings. All members of the evaluation team have taken the following mandatory trainings: HIPAA, Information Assurance, Collaborative Institutional Training Initiative (CITI) Training, and Ethics. The PHAD evaluation team will take every precaution to ensure the protection, privacy, and confidentiality of all PII.

Very Respectfully,
Stephanie

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