iPHD Third-Party Data Linkage Policy – November 21, 2025

Purpose: This policy establishes the conditions under which approved iPHD data recipients may request the linkage of iPHD data with datasets external to the iPHD. The purpose is to ensure that such linkages are undertaken in a manner that protects data privacy and security, mitigates the risk of re-identification, and maintains compliance with all applicable laws, regulations, and iPHD data use policies.

Applicability

This policy applies to all projects requesting to link iPHD data with external datasets outside of the iPHD, including (but not limited):

- Zip-code level or larger geographic unit data
- Census tract level data (where the tract ID will be replaced with a pseudo ID)
- Person-level proprietary datasets owned by another institution or government entity without PII; and
- Person-level proprietary datasets owned by another institution or government entity with PII (with and without individual consent)

All third-party linkage requests are project-specific and require approval from iPHD Governing Board. Data recipients and their institutions are **strictly prohibited from linking or attempting to link iPHD data** with any other dataset or source not expressly approved by iPHD and authorized in the Data Use Agreement.

Review and Approval Process

- Pre-Screening: The iPHD will review the proposed linkage to confirm technical feasibility, variable compatibility, and alignment with iPHD security and governance standards.
- Governance Oversight: iPHD Governing Board reserves the right to deny or condition any third-party linkage that introduces undue risk, violates data sharing restrictions, or is not required to fulfill approved project goals.

Attestations and Responsibilities of the Data Recipient and Institution

- **Justification:** Attestation that the linkage is critical to achieving the approved research aims.
- **Authorization:** Attestation that the data recipient and institution are authorized to access the external dataset and link with the iPHD data.
- **IRB Disclosure:** Attestation that the third-party linkage is fully described in the IRB protocol.
- **Non-Re-identification:** Agreement not to attempt to re-identify individuals and notify iPHD if reidentification should occur
- **Responsibility for Compliance:** Acknowledgment that the data recipient and institution remain responsible for maintaining all required privacy, confidentiality, and data use safeguards as specified in the iPHD DUA.

Third-Pary Linkages Involving PII

Projects involving external datasets for which the data recipient has access to PII without individual consent require that data analysis must be conducted within the Rutgers Institute for Health Data Core secure environment, with the data recipient responsible for payment of applicable access fees. Researchers must ensure that both the DUA and IRB explicitly authorize the linkage and that all analyses occur within the approved secure environment.

Fees and Cost Recovery

Additional fees may apply based on the complexity of the linkage, size of the files, and staff effort required. Fee waivers granted for the base iPHD project do not automatically extend to third-party linkage activities.