ACNM Policy on Protection of Membership Data Used for Research Purposes

Membership data are normally collected by associations for the purposes of describing member characteristics such as education, age and ethnicity as well as workforce characteristics of the membership. Licensure information is often collected as part of a membership survey. As a licensed health care provider, licensure information, including license number, is public information. It is also the industry norm for professional associations to collect complete license information about their members.

Membership surveys are exempt from human subject research review (attachment A), however this policy is developed in an effort to assure members that the data they provide are collected and maintained in a secure and confidential manner. Furthermore, analysis and public reporting of data whether on the ACNM website, Quickening, or published in a journal will not include personal identifiers.

Confidentiality and anonymity of member responses on membership surveys are maintained at all times accordingly:

1. Data that are collected online are stored on a secure server maintained by Vovici, Inc. Access to these data is password protected.
2. Personal information is not typically part of a membership survey and furthermore, potential identifiers such as membership number and ID are removed prior to exportation and analysis of data for research purposes to assure confidentiality and maintain anonymity.
3. Analysis occurs with aggregate de-identified data.
4. Raw data are accessible only by the ACNM staff and Vovici, Inc. technical personnel who are responsible for maintenance of data stored on their servers.

Effective January 1, 2009 membership surveys conducted by the ACNM national office Sr. Staff Researcher will include the following statement:

Membership information collected in this survey may be used in research describing membership characteristics, and workforce characteristics of ACNM members. This information may be used to inform policy makers, legislatures, consumers and others. The information may be published on the ACNM website, in Quickening or professional journals. Data will be de-identified and analyzed in the aggregate to assure confidentiality and maintain anonymity of those responding. Responding to the survey is voluntary and implies consent.
Chart 4: Does Exemption 45 CFR 46.101(b)(2) or (b)(3) (for Tests, Surveys, Interviews, Public Behavior Observation) Apply?

- From Chart 2
  - Does the research involve only the use of educational tests, survey procedures, interview procedures, or observation of public behavior?
    - YES ➔ Does the research involve children to whom 45 CFR part 46, subpart D applies?
      - YES ➔ Is the information obtained recorded in such a manner that human subjects can be identified, directly or through identifiers linked to the subjects; and could any disclosure of the human subjects' responses outside the research reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability, or reputation?
        - YES ➔ Research is not exempt under 45 CFR 46.101(b)(2). However, the 45 CFR 46.101(b)(3) exemption might apply.
          - NO ➔ Are the human subjects elected or appointed public officials or candidates for public office? (Applies to senior officials, such as mayor or school superintendent, rather than a police officer or teacher.)
            - NO ➔ Research is not exempt under 45 CFR 46.101(b)(2) or (b)(3).
              - GO TO Chart B
            - YES ➔ Does any Federal statute require without exception that the confidentiality of personally identifiable information will be maintained throughout the research and thereafter?
              - NO ➔ Research is exempt under 45 CFR 46.101(b)(3) from all 45 CFR part 46 requirements.
              - YES ➔ Research is exempt under 45 CFR 46.101(b)(2) exemption from 45 CFR part 46 requirements.

September 24, 2004