Introduction to PubCLEAR

What PubCLEAR is…
PubCLEAR is a process used to approve HCA Healthcare publications for external dissemination. This includes submissions to peer-reviewed journals, professional society journals and/or blogs, poster presentations, live or recorded presentations, and any public dissemination of HCA Healthcare data. You must receive PubCLEAR approval before releasing any information outside of HCA Healthcare.

What PubCLEAR isn’t…
• Permission to do research
• A peer review of your product
• An endorsement of your product’s results
• A retroactive approval of products already released

How long does clearance take?
Initial review can take up to 30 days. Time to final approval is NOT guaranteed.
Getting started

Two ways to submit:

1. GME Publication Clearance hyperlink in the center of the page
2. Submit to PubCLEAR on sidebar
Submission Agreement

Before you begin…

- You must complete a submission agreement. Read this carefully before agreeing to the terms on the page.

- This also provides instructions on how to complete the process.

Submission Agreement

Follow the instructions below to submit to PubCLEAR. You will be notified regarding the status of your submission within 30 days. All products must obtain publication clearance prior to external (outside of HCA Healthcare) release. Publication clearance is tied to product and not entity or occasion.

Before submitting, please read all relevant policies and/or submission guidelines.

The submission process consists of the following steps:
1. Read and accept the Submission Agreement below
2. Provide information about yourself, any co-authors, and your Division Research Director
3. Upload your electronic file and, if any, supplemental files

Before you begin, please be sure you have the following items:
- Your submission’s title
- The anticipated release date
- The FINAL submission ready electronic version of your product

Submission Agreement for PubCLEAR

By checking the box below, I agree to the terms on this page.

I warrant as follows:
1. That I have the full power and authority to make this agreement;
2. That the product does not infringe any copyright, nor violate any proprietary rights, nor contain any libelous matter, nor invade the privacy of any person or third party;
3. That the product has not been published externally with the same content or in the same format;
4. That I have obtained any necessary institutional review board documentation; and,
5. That I have obtained permission from my Division Research Director to release this work.
6. That I have obtained other local permission to submit this work for publication clearance.

NOTE: It is suggested that you print this page for your records.

Please check this if you agree to the above terms.

Continue
Submission Form

**Title**

This is the full, complete title of your scholarly product.

**Authors**

Add your DRD as last author. This is not for true authorship purposes; Research Directors need to stay in the loop about products in their divisions.

**Adding authors**

You can either search for an author or enter their information manually as seen with author number two.

**Institution**

All authors with HCA affiliation will use HCA Healthcare as their institution.
Submission Form Continued

**Division**
Select the division of the submitting author. Only HCA affiliated authors can submit to PubCLEAR.

**Hospital**
Select the hospital of the submitting author.

**Relationship to Facility**
What is the submitting author’s relationship to the institution?

If you have selected "Other" above, please specify:

**Document Types**
Choose the document type that most closely fits your scholarly product.

**Research Project ID**
Enter the Project ID received after DATACLEAR submission.

**Anticipated Release Date**
When do you anticipate sending this product to an external entity?

<table>
<thead>
<tr>
<th>Season</th>
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</table>
Submission Form Continued

**Anticipated Release Entity**

Examples of a release entity may include the title of a journal or a conference to which this research will be submitted.

**Release Entity**
Where will you be submitting your product? Typically the name of a journal or conference.

**Disciplines**

Please indicate the academic discipline(s) that best describes your submission. Click [here](#) to view the complete list of disciplines.

**Available:**
- Architecture
- Arts and Humanities
- Business
- Education
- Engineering
- Law
- Life Sciences
- Medicine and Health Sciences
  - Physical Sciences and Mathematics
  - Social and Behavioral Sciences

**Selected:**
- Medical Specialties
  - Allergy and Immunology
  - Anesthesiology
  - Behavioral Medicine
  - Cardiology
  - Critical Care
  - Dermatology
  - Emergency Medicine
  - Endocrinology, Diabetes, and Metabolism

**Disciplines**
Choose your program discipline and any other relevant topic areas. Disciplines most useful to HCA Healthcare authors will be under “Medicine and Health Sciences”, then under “Medical Specialties.”
Submission Form Continued

Comments

Is there any information that you need to get to the PubCLEAR administrators? The comment section is the best way to communicate about your submission.

Do you have permission from your Division Research Director to release this product?

- Yes
- No

Have you obtained other local approval to submit this work for publication clearance?

- Yes
- No

Upload File

Full text of submission:

- Upload file from your computer
- Import file from remote site
- Link out to file on remote site

Additional Files

Check the box in this section if you have additional files to submit with your product. This includes consent forms, IRB decision letters, and division specific approval forms.

(ex. patient consent forms, IRB letters, other supplementary material)

Please check this if you'd like to add additional files
Additional Files

PubCLEAR

Upload Supplemental Content

If your submission includes supplementary material—spreadsheets, audio clips, or other material that isn’t part of the text portion of your work—you can upload it here. If you wish to upload a supplementary file, use the form below to locate the file on your computer.

Click the Browse button to upload the file. Repeat this process for each additional file you want to upload. When you are done, click Continue.

![Image of upload form]

Supplemental Content page

You will be able to add supplementary files to your submission using this page.

*Please note: You can only access this page after checking the “Additional Files” box on the submission form.

Please click the Continue button once after you’ve attached your supplemental files.
Consent Forms

All case reports that include images and/or identifiers (found here) require signed patient consent forms attached as an Additional File to the submission. These include the following documents:

- Written case reports (e.g., abstracts, manuscripts, etc.)
- Posters of case reports
- Presentations of case reports
- Clinical images/videos

The Consent and Authorization Form to Release Information for a Case Report is available here under “I want to publish as a Case Study…”.
### Successful Submission

**Submission Metadata**

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<th>Value</th>
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<td>Division Research Director to release</td>
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<td>this product?</td>
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</tr>
<tr>
<td>Upload File</td>
<td>Download</td>
</tr>
<tr>
<td>Update Submission</td>
<td>Initial Submission</td>
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</tr>
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</table>
Checking on Your Submission

You can see the status of your submission by going to the My Account page and looking under PubCLEAR submissions.

- If the status is **UNDER REVIEW**, the submission has yet to be reviewed.
- You will receive an email when the status of your submission changes.
PubCLEAR approval – the first time!

A guide to expediting the publication clearance process
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PubCLEAR Process Guide
Revisions: What to Avoid
Small Edits

The majority of resubmissions are the result of minor edits. These can easily be fixed before submitting and can speed up clearance times for everyone.

IMPROPERLY SUBMITTED

Make sure you follow the instructions in the PubCLEAR Guide. Clearance requests submitted incorrectly will be sent back for correction without review.

NO RESEARCH PROJECT ID

For scholarly activity tracking purposes, all projects are required to obtain a Research Project ID via the DATACLEAR process whether they require HCA data or not. Submissions without a valid Research Project ID will be returned for revisions.

DOESN’T INCLUDE ACCURATE AUTHOR INFORMATION

Make sure all author information is correct. HCA Healthcare authors MUST use their professional email addresses. Division Research Directors must be included on the author list for communication purposes.
Small Edits

The majority of resubmissions are the result of minor edits. These can easily be fixed before submitting and can speed up clearance times for everyone.

NO HCA HEALTHCARE DISCLAIMER

Every type of scholarly product (excluding abstracts) must contain the HCA Healthcare disclaimer. This disclaimer can go in or around your funding, disclosure, or acknowledgements section. Full text below:

This research was supported (in whole or in part) by HCA Healthcare and/or an HCA Healthcare affiliated entity. The views expressed in this publication represent those of the author(s) and do not necessarily represent the official views of HCA Healthcare or any of its affiliated entities.

Note: Audio files must have the HCA Healthcare disclaimer narrated as part of the file. Video files must have the HCA Healthcare disclaimer present in the video file.

BRANDING

HCA Healthcare brand colors and fonts should be used if possible. HCA should never be used without Healthcare, and the term should never be broken up by a line break.

BRAND NAMES

Whenever possible, use generic names for pharmaceuticals. Unless scientifically relevant, avoid all use of vendor names when referencing products/services in text or photographs. If scientifically relevant, you will likely need to seek permission from the purchasing contract owner to assure we are not violating any agreements or business expectations.
Large Edits: HIPAA De-Identification

For a scholarly product to be HIPAA De-Identified, the following information MUST be removed:

1. Names
2. All geographic subdivisions smaller than a state, except for the initial three digits of a ZIP Code if, according to the current publicly available data:
   1. The geographic unit formed by combining all ZIP Codes with the same three initial digits contains more than 20,000 people.
   2. The initial three digits of a ZIP Code for all such geographic units containing 20,000 or fewer people are changed to 000.
3. All elements of dates (except year) for dates directly related to an individual, including birth date, admission date, discharge date, date of death; and all ages over 89 and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older.
4. Telephone numbers
5. Facsimile numbers
6. Electronic mail addresses
7. Social security numbers
8. Medical record numbers
9. Health plan beneficiary numbers
10. Account numbers
Large Edits: HIPAA De-Identification

11. Certificate/license numbers
12. Vehicle identifiers and serial numbers, including license plate numbers
13. Device identifiers and serial numbers
14. Web universal resource locators (URLs)
15. Internet protocol (IP) address numbers
16. Biometric identifiers, including fingerprints and voiceprints
17. Full-face photographic images and any comparable images
18. Any other unique identifying number, characteristic, or code however a covered entity may assign to, and retain with the health information a code or other means of record identification if that code is not derived from or related to the information about the individual (i.e. Initials) and could not be translated to identify the individual. The covered entity may not use or disclose the code or other means of record identification for any other purpose and may not disclose its method of re-identifying the information.
Common Examples of HIPAA Violations

Age over 89 must be hidden (“elderly”, “89+”, “over 90”)

Identifying photographs

Ask yourself, “Could I recognize this person?”

PHI in images
Large Edits: Image Copyright Violations

Images used in your publications should either be of your own creation or used within the permissions of the image owner.

Copying and pasting images from the internet without assuring permissions may delay your publication or even result in legal action!

Unless otherwise specified, images and figures published in journal articles are under copyright protection by the publisher/journal. Permission must be granted by the copyright holder to reproduce a published image even if you are the author of the original publication.

HCA Healthcare maintains a subscription to the Copyright Clearance Center that grants certain permissions for copyrighted content. Verify the usage restrictions and permissions for the publication prior to the use of an image.

All non-original images and figures MUST be cited and attributed.
## Sources for HCA Healthcare Licensed/Public Domain Images

<table>
<thead>
<tr>
<th>Source</th>
<th>Description</th>
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<tr>
<td>HCA MediaWorks</td>
<td>HCA Healthcare MediaWorks has a variety of HCA Healthcare approved icons, logos, and stock photos</td>
</tr>
<tr>
<td>National Institutes of Health</td>
<td>NIH images, including illustrations and scientific images</td>
</tr>
<tr>
<td>National Library of Medicine</td>
<td>National Library of Medicine images; includes collections on a variety of topics (e.g., history of medicine, health policy, NLM publications, NIH reports, historical images).</td>
</tr>
<tr>
<td>National Cancer Institute Visuals Online</td>
<td>Cancer related images and illustrations</td>
</tr>
<tr>
<td>Centers for Disease Control and Prevention: Public Health Image Library</td>
<td>Public health images</td>
</tr>
<tr>
<td>National Library of Medicine: MedPix</td>
<td>Case images; for personal use (e.g., teaching purposes)</td>
</tr>
<tr>
<td>Health Education Assets Library</td>
<td>Various images for health sciences education. Large collection of ECG examples, hematology images, histology images, and surgical illustrations</td>
</tr>
<tr>
<td>Duke University Medical Center Library and Archives</td>
<td>Links to various image collections by specialty. Note that each source may have different guidelines for reuse.</td>
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<td>Weill Cornell Medicine Samuel J. Wood Library</td>
<td>Links to various image collections. Note that each source may have different guidelines for reuse.</td>
</tr>
<tr>
<td>Unsplash</td>
<td>Stock Photos</td>
</tr>
</tbody>
</table>
Searching for Images and Associated Usage Rights

Search engines have “tools” or “advanced search” options to filter by usage rights.

For images found on Wikipedia or other websites, view the source information of the image.
Large Edits: Non-Standard Template

Posters should share a common look and feel whenever possible. The approved poster/presentation templates are found on MediaWorks here.

If you need to justify the need for use of a non-standard template, please do so in the comments section of your submission.

Note that your non-standard poster must include the HCA Healthcare logo and disclaimer:

This research was supported (in whole or in part) by HCA Healthcare and/or an HCA Healthcare affiliated entity. The views expressed in this publication represent those of the author(s) and do not necessarily represent the official views of HCA Healthcare or any of its affiliated entities.
Large Edits: Sensitive Information

Cost Information
Our cost information is confidential! Do not include costs unless you are getting them from publically available sources. You may also use percentage improvement instead of using our confidential cost information. For example, instead of saying “HCA Healthcare costs went down from $750 to $500” you can state “HCA Healthcare experienced a 33% cost reduction.”

Sensitive Statistics
When it is necessary to include statistics that are also part of public or accreditation reporting (e.g. infection rates), be sure the statistics are the same as those publically reported or describe how you calculated them differently.
Understanding Clinical Review

What is Clinical Review?

Clinical Review is the process of tagging a subject expert reviewer to evaluate a submission.

Why would a product need Clinical Review?

- Includes potentially sensitive information
- Requires high level clinical knowledge to review
- Potential intellectual property
- Informs future internal practice
Denial: When it Happens 📣

**Plagiarism**
- If a submission is flagged for plagiarism, the request is immediately denied. An email is sent to all authors and the Division Research Director. An edited submission can be sent for clearance.

**Multiple requests for the same product**
- There is one request per product (case report, abstract, manuscript, etc.) Please have only one open submission per product.

**Multiple products on same request**
- There is one product (case report, abstract, manuscript, etc.) per request. Please have only one product per open submission.
Denial: When it Happens

**Already published**
- The purpose of the publication clearance process is to review products before they are released externally. PubCLEAR administrators will not retroactively approve a released product.

**Submitted without the permission of Division Research Director**
- All submissions require knowledge and approval of the Division Research Director. Submission without approval voids the submission agreement.

**Data obtained against HCA Healthcare standard procedure**
- Submissions with HCA Healthcare health data obtained outside of standard procedure will be denied. Contact your division research leadership for more information on collecting and requesting data.
PubCLEAR Questions?

Email Pub.CLEAR@HCAHealthcare.com for more information. Be sure to include your submission ID in all communication with PubCLEAR administrators.